

## **Comment 1 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Bruce

Last Name: Pomer

Email Address: [deburgh@calhealthofficers.org](mailto:deburgh@calhealthofficers.org)

Affiliation:

Subject: Local health departments

Comment:

My name is Bruce Pomer and I represent the Health Officers Association of California. These are the physician health officers in California's 58 counties and 3 cities with health jurisdictions. As you know, health and climate change are intimately linked. The World Health Organization reports that human-induced changes in the Earth's climate now lead to at least 5 million cases of illness and more than 150,000 deaths each year. Heat-related illness and food or water-borne pathogens are notable examples of health risks associated with climate change.

The health officers have been engaged in this topic from the beginning. Today, I am here to emphasize the importance of public health programs and to request that some of the Air Pollution Control Fund are made available to local health departments. As you know, AB 32 explicitly promoted public health co-benefits of environmental policies, and directed investment toward disadvantaged communities.

The most economically disadvantaged communities are also in many cases the most adversely affected by environmental and health impacts. They face increased air pollution and its associated chronic diseases; decreased access to safe places for physical activity; limited access to healthy food; tobacco exposure; and limited access to affordable housing and transportation. This results in decreased life expectancies that can be 10 to 18 years shorter than those of people who reside in wealthier communities.

Improving public health with active transportation and other mitigation measures will help lower health care costs. In California, it has been estimated that each dollar spent on public health improvements will save the state \$4.80 in five years.

The California Department of Public Health and 61 local health departments in the state form the backbone of California's public health infrastructure. Local health departments work with nonprofits, community organizations, residents, and other government entities to protect public health at the local level. It is critical that revenues intended to support public health go to these local health departments.

In defining priorities for the Air Pollution Control Fund, we believe that the ARB should consider using the revenue disbursement model developed by the California Tobacco Control Program, which has successfully averted over a million tobacco-related deaths and

lowered health care expenditures by \$86 billion. CDPH manages this program and local health departments serve as local lead agencies, receiving a base allocation of funds with the ability to apply for more on a competitive basis. This mix of funding has provided continuity, diversity, and balance to the Tobacco Control Program, and this model of revenue allocation would do the same for the Air Pollution Control Fund mitigation efforts.

The California Department of Public Health has laid out a plan for distribution of these funds based on identification of vulnerable and disadvantaged communities, community health assessments, and community health improvement programs. The health officers urge you to follow these recommendations.

CDPH has also identified a number of evidence-based mitigation efforts that would be targeted with these funds. These programs include biking, walking, public transit, transit-oriented development, increasing fuel efficiency, creating community transportation plans, supporting high-density housing and mixed use development, urban forestry, and green roofs.

The health officers urge you to use cap and trade revenues to invest in meaningful and reliable mitigation efforts. This means investing in local health departments. Thank you for your time and consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-05-25 11:18:46

No Duplicates.

**Comment 2 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Josh  
Last Name: Rosa  
Email Address: jrosa@nossaman.com  
Affiliation:

Subject: AB 32 Cap and Trade Auction Revenues Investment  
Comment:

Please see attached document. Thank you.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/2-ab\\_32\\_auction\\_revenues\\_investment-cal\\_smacna.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/2-ab_32_auction_revenues_investment-cal_smacna.pdf)

Original File Name: AB 32 Auction Revenues Investment-CAL SMACNA.pdf

Date and Time Comment Was Submitted: 2012-05-25 17:08:02

No Duplicates.

## **Comment 3 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Edwin  
Last Name: Hoffman  
Email Address: ehoffman@socoolinc.com  
Affiliation: SoCool Inc.

Subject: Investment of CAT funds  
Comment:

AB32 requires that funds realized from Cap and Trade auctions be invested to reduce greenhouse gases, and to benefit poorer and disadvantaged members of Californian Society.

SoCool Inc. has a proposal to directly addresses these requirements.

SoCool's Cool Breeze product will directly address the GHG emissions problem, by keeping parked vehicles cooler using Solar Power. The effects of using Cool Breeze are directly proven by scientific papers produced by the National Renewable Energy Laboratories (NREL), the Environmental Protection Agency (EPA) and by international studies in the area of vehicle cabin temperature control.

It is estimated by NREL that an average of 20-21% of all vehicle produced GHGs can be prevented by a technology like Cool Breeze.

### Green House Gas reduction Proposal

SoCool's proposal is to use CAT revenue to fit Cool Breeze units into every State, City, Town owned vehicle, thereby reducing that agencies fuel costs, and reducing directly emissions produced by those vehicles. To also over a relatively short period (5-10 years) fit this technology into every new and used private vehicle and commercial vehicle operated in California.

The direct benefit in GHG emission reduction will the be largest ever obtained in any previous attempt, and larger than any proposed to date in California.

This technology has already been tested and studied by NREL, and SoCool's version of it will be tested and reported on by NREL by end July 2012.

Sub Proposal to address disadvantaged people and areas of California.

1. Reduction of emissions will directly affect disadvantaged areas by reducing GHG emissions along the freeways of California.
2. With a government mandate to fit these units to all vehicles will come a large number of jobs performing these installations. Our Distribution partner, Signature already operates in California, and will require to significantly increase manpower over the entire state in order to fulfill a high implementation rate. These jobs will be created in all areas of California, including many disadvantaged areas. In addition Signature presently educates members of it's dealer network (country wide) and welcomes new

dealers with assistance and training for all it's products.

A/ Should an implementation of the order be proposed. it would mean a large number of new dealers signed up, and a large number of personnel required to provide the numbers of installations required.

B/ Special dispensation can be arranged to give disadvantaged businesses (identified by Government) be given priority to join Signature's dealer/reseller network.

This is an initial proposal at present at would be expanded upon with discussions between CARB, SoCool/Signature, and Other interested parties. However it is a proposal that not only directly addresses two main tenets of AB32, but also allows State and Local Governments to directly benefit with reductions of fuel costs. It is expect that a high level of fuel savings can be obtained using NREL's numbers on the amount of fuel used operating air conditioning systems in vehicles.

NREL derived numbers:

A NREL study suggested that 79% of all vehicle journeys are of a duration of 30 minutes or less. Between these journeys the vehicle is parked, and heating up to high levels if parked in the sun.

SoCool's Cool Breeze keeps these parked vehicles at ambient temperature, lowering the need to operate the air conditioner at full speed to "cool the cabin down".

During the periods that the vehicle is moving, and the A/C is on at full speed (trying to lower cabin temperature) the vehicle is using the equivalent extra fuel to operating the vehicle at 35MPH.

A major problem is that the vehicle is not likely to have cooled the cabin during the "30 Minute" journey and is therefore just going to heat up again faster, causing another full A/C journey later.

NREL also states that on average the reduction in fuel use by not operating the air conditioning is approximately 20-21%, with also leads to a 20-21% drop in emissions.

Therefore using NREL's numbers, 79% of all journeys will elicit a 20-21% fuel saving, and emission reduction if the vehicle cabin is kept at ambient temperature while parked.

It is therefore also possible to say that all agencies that used SoCool's Cool Breeze can expect a general reduction in fuel costs of 20-21%, and with therefore also reduce emissions by a similar amount.

If California was to implement a complete state wide installation of Cool Breeze, the state would show a 20-21% reduction in emissions by the end of this period which would be the most significant drop in GHG emissions in state history.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-05-26 19:01:03

No Duplicates.

## **Comment 4 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Dominic

Last Name: Meo III

Email Address: dommeo@verizon.net

Affiliation: Meo & Associates

Subject: Reducing GHG Emissions and Combating Leakage

Comment:

During the public workshop, several ARB Board Members expressed the importance of using C&T auction proceeds to find novel ways to reduce GHG emissions while combating leakage. I would like to suggest that we have a simple, yet very effective way to do this.

Cement producers should receive a carbon credit for partnering with concrete batch plants to produce "low-carbon" concrete formulations which use supplementary cementitious materials (SCMs) to reduce the amount of cement used in concrete. The less cement used in a concrete formulation, the lower the GHG emissions in California, which is a main goal of AB 32.

The use of SCMs is not new. For years, Caltrans has used SCMs such as fly ash to improve the properties of the concrete used to make our freeways.

Right now, C&T regulations restrict carbon credits available to cement producers to GHG reductions made in the process used to make cement. CARB should recognize the linkage between cement, which is made solely to make concrete, and the overall GHG emissions associated with making concrete.

By allowing cement producers to obtain carbon credits for promoting low-carbon concrete formulations, they would be less keen on importing cement to show GHG reductions at the cement kiln, a clear indication of leakage.

Making low-carbon concrete is a bit more expensive than producing conventional concrete. Proceeds from C&T auctions should be used to provide a subsidy to cover this increased cost, thereby promoting the use of low-carbon concrete, which will result in an overall reduction in GHG emissions in our state without creating leakage. Please review the attached PowerPoint for additional information.

Please let me know if you would like any additional information.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/4-low-carbon\\_concrete\\_progress\\_report\\_06-24-11\\_rev.\\_2\\_06-30-11\\_.ppt](http://www.arb.ca.gov/lists/investmentplan-ws/4-low-carbon_concrete_progress_report_06-24-11_rev._2_06-30-11_.ppt)

Original File Name: Low-Carbon Concrete Progress Report 06-24-11 (Rev. 2 06-30-11).ppt

Date and Time Comment Was Submitted: 2012-05-29 08:57:09

No Duplicates.

**Comment 5 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Fred  
Last Name: Walti  
Email Address: fred@lincubator.org  
Affiliation: Los Angeles Cleantech Incubator

Subject: Create a Transformation Fund  
Comment:

Please see the attached one page description of my recommendation for solving the early stage investment capital crisis that is facing all cleantech companies.

Thank you

Best regards,

Fred Walti

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/5-carb\\_ab\\_32\\_investment\\_recommendation.\\_laci.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/5-carb_ab_32_investment_recommendation._laci.pdf)

Original File Name: CARB AB 32 Investment Recommendation. LACI.pdf

Date and Time Comment Was Submitted: 2012-05-30 08:13:31

No Duplicates.



## **Comment 6 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: John  
Last Name: Tillman  
Email Address: john.tillman@daimler.com  
Affiliation: Hydrogen Infrastructure Trust

Subject: \$25 Million dollar funds for Hydrogen Infrastructure  
Comment:

The Hydrogen Infrastructure Trust Advocacy Group is a coalition of automakers, NGOs, fuel providers, air districts and hydrogen businesses.

Our group came together to continue support and expansion of a network of hydrogen fuel stations needed for successful launch of the fuel cell electric vehicle market in California. To accomplish this the creation of the Hydrogen Infrastructure Trust was proposed.

1. Many of our groups signatories believe that Funding hydrogen stations with cap & trade funds meets the requirement for a nexus with GHG emission reductions.
2. Hydrogen station build out, supported by the state is in line with the Governor's EO on ZEVs
3. We're asking for \$25M over a period of years to support establishment and operation of 68 stations statewide
4. This support will give OEMs the confidence in infrastructure needed to begin market launch of fuel cell vehicles
5. This initial network of stations coupled with commercial launch of fuel cell vehicles will be the bridge to commercial infrastructure investment or the Clean Fuels Outlet requirements that will ensure infrastructure for a growing FCV market.

Thank You  
John Tillman  
Manager Regulatory Affairs, Daimler

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/6-hit\\_ab32\\_presentation.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/6-hit_ab32_presentation.pdf)

Original File Name: HIT\_AB32\_Presentation.pdf

Date and Time Comment Was Submitted: 2012-05-30 11:10:48

No Duplicates.

**Comment 7 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: James

Last Name: Brady

Email Address: james.brady59@gmail.com

Affiliation:

Subject: Water

Comment:

I recently attended the last hearing and would like to offer a clean tech solution to reduce overall green house gas emission in our State. I heard many people speak about funding for various projects from the proceed of the auction.

Although I was delighted to hear that Water would be included in your plans moving forward, I did not hear of a solution so I'm proposing one. Atmospheric Water Generation is a solution that California need immediately and should be funded to provide much need alternative for future drinking water supplies. This clean technology uses wind, solar, to make pure drinking water from an all natural source. Our large Cloudburst unit can clean up to 40,000 standard cubic feet or air per minuet, which makes it the biggest carbon buster in the world. If CARB would like to see a model unit we are located in San Luis Obisbo, Ca. Please see ([www.aws-h2o.com](http://www.aws-h2o.com)) for more information about our clean water technology.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-05-30 10:55:24

No Duplicates.

**Comment 8 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Jerry

Last Name: Plummer

Email Address: plummerj@surewest.net

Affiliation: Sacramento Area Bicycle Advocates

Subject: Invest in bicycle infrastructure

Comment:

I would urge you to consider investing Cap-And-Trade Auction Proceeds in cycling infrastructure.

Transportation is a huge generator of carbon, and it is hard to find a lower carbon alternative to serious transportation. In addition there are tremendous health benefits to cycling. In much of California, cycling is a year round alternative, especially for the majority of trips which are short distance. Compared to vehicles, bicycle infrastructure is very cheap with a big bang for the buck. For all these reasons, a small investment in promoting cycling can have a very large carbon impact.

Sincerely,  
Jerry Plummer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-05-30 14:36:48

No Duplicates.

## **Comment 9 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Carlos  
Last Name: Naranjo Jr.  
Email Address: elhingo@netzero.net  
Affiliation:

Subject: The Social Cost of Air Pollution  
Comment:

Dear Board Members,

The cost of air pollution has long existed and it has been a slow gain in efforts to protect people and the environment. At the same time, industries have been able to become well established technologically and financially. The slow changing gears of our economy and society toward a cleaner future needs proper investment. In order to lead we must pick up where we left off or pick up where we never bothered to. As much as we can look toward the future to invest in the proceeds of cap and trade, we must also look to the past as a lesson.

Looking to the past means finding solutions to environmental endeavors that have both succeeded and failed. In cases of success, preservation of natural habitats and sceneries over demolition for new roads has stood out. Yet, the issue of traffic congestion persists and making public transportation more user friendly needs to happen. In addition, the acquisition of natural gas or oil off shore has brought awareness to our need for sources of energy and the need to preserve our coast. There is a false concept amongst consumers that if resources are constantly being recovered and refined the cost of those items will be reduced; although, prices have been allowed to increase regardless of supply. It is important that transparency on the part of the Cap-and-Trade Program make up where a lack of transparency has existed in industry. We must, also, look beyond these issues to see what takes place in areas that are highly populated

A large factor in the hidden cost of our current means of energy production and consumption are those that suffer from air pollution. In densely populated areas there is a tendency by families to ignore regulatory costs and, to a further extent, the health of the most prone to air pollution complications, children. As there currently is a means for reporting vehicle pollution, it is seldom spoken of or reported in terms of results. There, also, is a lack of awareness of symptoms or viability of treatment for those who are affected or can be potentially affected by air pollution. Looking forward, preventing exposure means urban planning with sources of air pollution in mind and retrofitting vehicles, such as school buses, to minimize exposure.

To make steady progress in the switch to reduced carbon sources of energy, we must confront the hurdles that will be encountered by localities and the efforts to capitalize by false claims that will be made by companies. Also, investing in reliable green enterprises

in California that will create jobs, boost the economy and be competitive at a global scale will prove to establish a viable economic alternative. This will be a product of our educational system and leading research schools that must not only emphasize this in research but in teaching, as well.

Sincerely,  
Carlos Naranjo Jr.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-02 12:51:26

No Duplicates.

## **Comment 10 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Leonard

Last Name: Robinson

Email Address: LRobinson@envirobro.com

Affiliation: California Black Chamber of Commerce

Subject: Cap & Trade Auction Proceed Investment Recommendations

Comment:

There is a provision existing in AB 32 that engages "disadvantaged communities". For purposes of these recommendations "disadvantaged communities" is defined as under-served communities and under-utilized businesses.

There are three things that the proceeds should be invested: a) transformation of (under-utilized) businesses to engage in practices, procedures, products and services that help realize the green houses gas (GHG) reduction goals of AB 32; b) green job education and training for (under-served)youth and veterans...especially those returning from Gulf War service; and c) health studies for those (under-served) communities that are disproportionately impacted by air pollution.

These 10 points that should be implemented into auction proceeds strategy. The investment shall:

1. Have a direct nexus with the GHG reduction goals of AB 32
2. Engage under-utilized businesses in GHG reduction policies; practices; products and services
3. Directly and indirectly stimulate green job creation through the engagement of under-utilized businesses
4. Provide green technical education and training to under-served communities
5. Study the health effects of under-served communities that receive a disproportionate amount of air pollution
6. Have an identifiable environmental and economical return on investment
7. Be shovel ready
8. Contain economical and environmental performance measures
9. Be replicable
10. Be sustainable

Attached is an outline of the California Black Chamber of Commerce Green Initiative that incorporates the above-listed recommendations.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/11-green\\_initiative.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/11-green_initiative.pdf)

Original File Name: Green Initiative.pdf

Date and Time Comment Was Submitted: 2012-06-03 17:25:22

No Duplicates.

## **Comment 11 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Mitch

Last Name: Sears

Email Address: msears@cityofdavis.org

Affiliation: City of Davis

Subject: Investment of Cap-and-Trade Proceeds - Local Government Involvement

Comment:

Chairperson Nichols:

I attended the May 24, 2012 Public Consultation Meeting on Investment of Auction Funds from California Cap-and-Trade Program on behalf of the City of Davis but was unable to speak due to the limited time allocated to public comment (too many speakers). The following comments were prepared by the City of Davis for the meeting:

Chairperson Nichols, Board Members, the City of Davis appreciates the opportunity to provide comment on this important issue.

The City's Mayor, Joe Krovoza, was unable to attend today's meeting due to scheduling conflicts but is very engaged in this topic and brings a unique perspective as both the City's Mayor and the Director of Development for the UC Davis Energy Efficiency Center and Institute for Transportation Studies.

The City wanted to make two simple comments, but first some context.

In Davis, better than 20% of work trips are by bicycle, more than double the amount of the next best city in the United States. The City is the birthplace of Title 24, which has gone on to save Californians billions of dollars. Davis is also home of the 1st utility scale grid tied solar power plant in the country.

This context is provide to emphasize that the City has been implementing energy reducing programs for decades - it understands how to start and maintain programs that improve the community and reduce GHG. In addition, the majority of GHG emissions in California come from activities that happen in its cities (50-70% of GHG comes from activates related to consumers - LBNL, 2012).

The City would like to make two comments: one general and one specific.

1. The City believes that local governments are uniquely positioned to play a significant role in implementing AB 32. There are more than 100 local climate actions plans in CA that have been vetted and adopted by communities in every part of the state. The plans are essentially pre-existing investment plans that the State can quickly and efficiently activate through Cap-and-Trade investments.



2. More specifically, the City would like to highlight the critical role of social innovation at the local level and how it connects to statewide GHG Reduction strategies. We submit this 2012 White Paper (attached), Local Carbon Reduction Initiatives, in support of the proposition that the State's GHG emission targets cannot be achieved without a robust, strategic demand side strategy designed to fully integrate with technological innovation and current supply side programs. The City calls your attention to the involvement of Lawrence Berkeley National Labs in this white paper as an example of the caliber of organizations that are directly engaged in this issue and view it as a critical part of a solution set for statewide GHG reductions. One of LBNL's conclusions is that focusing solely on technology, markets, and policy in climate mitigation strategies is incomplete without including human and social factors, which can be major drivers for technology adoption, policy adoption, and market creation.

Davis and its partners encourage the ABR and its staff to directly include local jurisdictions with long-term experience in implementing GHG reduction programs in this critically important discussion. Thank you again for the opportunity to provide comment.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/12-investing\\_ca\\_cap\\_and\\_trade\\_revenues\\_in\\_local\\_carbon\\_reduction\\_initiatives\\_v1.2.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/12-investing_ca_cap_and_trade_revenues_in_local_carbon_reduction_initiatives_v1.2.pdf)

Original File Name: Investing CA Cap and Trade Revenues in Local Carbon Reduction Initiatives v1.2.pdf

Date and Time Comment Was Submitted: 2012-06-05 09:36:43

No Duplicates.

**Comment 12 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Rick

Last Name: Brown

Email Address: Rick.Brown@TVRPLLC.com

Affiliation: TerraVerde Renewable Partners

Subject: Recommendations for Investment Plan for Cap-and-Trade Auction Proceeds

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/19-terra\\_verde\\_renewable\\_partners\\_.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/19-terra_verde_renewable_partners_.pdf)

Original File Name: Terra Verde Renewable Partners .pdf

Date and Time Comment Was Submitted: 2012-06-05 15:55:45

No Duplicates.

**Comment 13 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Edwin  
Last Name: Hoffman  
Email Address: mfarr@arb.ca.gov  
Affiliation: SoCool

Subject: Investing CA Cap-and-Trade Program Auction Proceed  
Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/20-socool.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/20-socool.pdf)

Original File Name: SoCool.pdf

Date and Time Comment Was Submitted: 2012-06-07 17:15:00

No Duplicates.

**Comment 14 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Rock E.

Last Name: Miller

Email Address: mfarr@arb.ca.gov

Affiliation: Institute of Transportation Engineers

Subject: Urban Transportation Management and Operations Funding via Cap-and-Trade  
Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/21-institute\\_of\\_transportation\\_engineers.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/21-institute_of_transportation_engineers.pdf)

Original File Name: Institute of Transportation Engineers.pdf

Date and Time Comment Was Submitted: 2012-06-07 17:19:05

No Duplicates.

## **Comment 15 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Odell

Last Name: McWane

Email Address: [omcwane@materialsite.com](mailto:omcwane@materialsite.com)

Affiliation: McWane and Associates ([www.materialsite.com](http://www.materialsite.com)).

Subject: Invest cap and trade revenues in engineer, consultant, database

Comment:

Some auction revenues should be invested in setting up and maintaining a database of engineers and consultants who can help regulated companies comply with the environmental requirements by designing, building, upgrading or maintaining the power facility, or other emission source after the regulatory requirements have been determined.

The database should be searchable by each engineering and consulting discipline, and with a description of what each company or individual does. The relevant disciplines include:

Welding engineers and consultants (see [www.materialsite.com](http://www.materialsite.com) for definition)

Metallurgical engineers and consultants (see [www.materialsite.com](http://www.materialsite.com) for definition)

Materials engineers and consultants (see [www.materialsite.com](http://www.materialsite.com) for definition)

Mechanical engineers and consultants

Civil engineers and consultants

Electrical engineers and consultants

Structural engineers and consultants

For Example:

After determining elsewhere what the regulatory requirements are, the regulated business may decide to install an air pollution control system, or improve the plant efficiency. Therefore the regulated business searches the database for a mechanical engineer or consultant who can design the air pollution or energy efficiency system. The regulated business also searches the database for a metallurgical or materials engineer who will work with the mechanical engineer to assist in selecting and specifying the appropriate high temperature materials needed for the emission control technologies, so as to sustain the high temperatures, pressures, and corrosive environment for the life of the plant without degrading. Also the regulated business searches the database for a welding engineer or consultant who will work with both the mechanical and metallurgical or materials engineer when writing the welding specification which specifies how to qualify welding procedures and welders to fabricate and weld the high temperature materials so as to not degrade its microstructure. Degrading the microstructure of high temperature materials by improper fabrication and welding can shorten the materials life, and lead to premature material failure, unexpected outages, release of air pollutants, and life threatening steam releasing accidents. A case in point are the attempts of some power companies, their

engineers and designers to specify advanced power plant material SA 335, Grade P91, 9Cr-1Mo steel pipe, because of its long term high temperature properties. And as a result having the material fail prematurely due to improper fabrication, welding, and heat-treating procedures used by contractors and maintenance personnel.

This example stresses the point that using the correct degree of engineering and consulting discipline from a high quality database in a team effort to properly select, fabricate, and weld high temperature materials used for energy efficiency or emission control technologies, are as important as selecting or designing the correct energy efficiency and emission control technologies for compliance.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-07 19:32:19

No Duplicates.

**Comment 16 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Joe

Last Name: Caves

Email Address: joe@csgcalifornia.com

Affiliation:

Subject: Transportation Coalition - Cap and Trade Investment - Comments

Comment:

Please accept these comments as follow up from the CARB workshop on May 24th re: cap and trade investments on behalf of the following organizations: California Alliance for Jobs, Transportation California, California Transit Association, and California State Association of Counties.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/23-trans\\_funding\\_coalition\\_cap\\_and\\_trade\\_letter\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/23-trans_funding_coalition_cap_and_trade_letter_to_carb.pdf)

Original File Name: Trans Funding Coalition Cap and Trade Letter to CARB.pdf

Date and Time Comment Was Submitted: 2012-06-08 08:39:53

No Duplicates.

## **Comment 17 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Paul B.  
Last Name: Scott  
Email Address: pbscott2@gmail.com  
Affiliation: Ballard Power

Subject: Zero Emission Transit Bus Program  
Comment:

June 8, 2012

RE: Zero Emission Transit Bus Value Proposition -Argument for use of Cap & Trade Proceeds for ZEB Mass Transit

Transit buses offer a cost effective means of reduction of vehicle miles traveled, offering both significant fuel use and air pollution reduction as cars are left at home. However, public bus transportation has been deemphasized and de-funded in recent tight budget years. Disadvantaged city communities are twice aggrieved by this, losing public transport to get to work while the resultant increase in traffic adds to criteria and GHG pollution. California can be a national leader in replacing dirty fuel buses with quiet and clean zero emission electric drive buses. An attractive and convenient bus system, will lead to job creation and massive reductions in emissions!

Zero emission transit buses were stipulated by the CARB ZEB rule twelve years ago. Although ZEB transit buses routinely operate at demonstration sites in California, Connecticut and Canada, widespread implementation will require assurances of continued ability to fund the production of these buses and infrastructure. It is proposed that the ARB receive supplemental funding at the rate of \$150M/year to implement the ZEB rule. Inner city use of zero emission buses will directly address air quality equity concerns, will increase ridership and reduce commuter traffic. Studies show that monies spent on public transit are the best investment in job creation, with 36,000 jobs created or supported per billion dollars of investment. With recent capital cost reductions in fuel cell hybrid and battery electric buses, and federal matching funds supporting up to 80% of the cost of ZE transit buses, the investment by California in the incremental bus costs will result in real value for the State. Mature ZEB technology has demonstrated equivalent or better vehicle performance in multiple demonstrations, what is left in order to realize the vision of the CARB ZEB rule is to reduce the production costs of the buses through volume deployments. These Cap & Trade proceeds present the opportunity to enable this.

This investment in Zero Emissions buses can have dramatic results:

- The supplemental investment will result in annual GHG emission reductions of near two million metric tons CO<sub>2</sub> per year. For an assumed 20 yr bus life, these emission reductions come at a price to California of approximately \$40/metric ton CO<sub>2</sub> reduction.



- Fuel savings and ghg emissions reductions solely by transit bus replacement would amount to near half the California Energy Commission annual projected 2020 emissions reductions.
- Savings to the transit agencies from replacement of petroleum based fuels by hydrogen and electric fuel (at a fraction of the cost) will provide further fiduciary benefits over the bus life.
- Health related benefits related to e.g. asthma, cancer are also significant.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/24-120608\\_ballard\\_endorsement\\_of\\_spending\\_cap\\_trade.docx](http://www.arb.ca.gov/lists/investmentplan-ws/24-120608_ballard_endorsement_of_spending_cap_trade.docx)

Original File Name: 120608 Ballard endorsement of spending Cap&Trade.docx

Date and Time Comment Was Submitted: 2012-06-08 12:13:02

No Duplicates.

## **Comment 18 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Walt

Last Name: Seifert

Email Address: bikeguy@surewest.net

Affiliation:

Subject: Investment in urban bicycle infrastructure

Comment:

How to invest. Funds from the cap and trade program should be invested in bicycle infrastructure in urban areas. The transportation sector is the biggest source of greenhouse gas emissions in California. Using cap and trade funds to reduce greenhouse gas emissions from the transportation sector is a logical priority. The potential for reducing vehicle miles travelled and increasing bicycle trips is great. Bicycling rates for most California urban areas are at relatively low levels. However, the rate of trip making by bike in California, and in cities around the world, has dramatically increased when investments in bicycle infrastructure and commitments to bicycling as a form of transportation have been made. Forty percent of all trips are less than two miles, a distance that is easily bikeable by people of all ages and abilities. Those trips can be made in a time that is competitive with driving. Countless surveys have shown that the reason most people don't bike now is fear, though many indicate they would be willing to bike if facilities like bike lanes and bike paths were available.

Bicycling is the least expensive form of transportation for most trips. When all costs are considered, it is far less expensive than driving or transit. At the same time, bicycling is an effective way to increase the reach of transit, greatly expanding the size of the usual "walkshed" to transit stops or stations.

Bicycling is proven and simple technology. It's been shown to work on any scale. It doesn't rely on an untried, speculative concept or a new product that someone is trying to sell. Supporting bicycling through infrastructure construction is low in risk and cost.

The ancillary benefits of increased levels of bicycling, without the considering the reduction in greenhouse gases, are further justification for investing in bicycle infrastructure. These benefits alone justify bicycle infrastructure investment. The benefits include: improvements in public health through increased physical activity (and decreased levels of obesity and overweight) and fewer vehicle crashes, improved air quality through reduction in smog and particulates, reduced energy consumption, reduced traffic congestion and reduced noise levels. Together these would result in higher quality of life in California communities.

The Rails to Trails Conservancy report Active Transportation in America

[http://www.railstotrails.org/resources/documents/whatwedo/atfa/ATFA\\_20081020.p](http://www.railstotrails.org/resources/documents/whatwedo/atfa/ATFA_20081020.p)

df,  
quantifies CO2 reductions, increased physical activity levels, and fuel savings. The report estimates monetary savings from three different scenarios of bicycle/pedestrian infrastructure investment nationwide. The estimated dollar savings range from \$4 billion to \$69 billion and don't include savings from reductions in automobile crashes.

Criteria for investment of cap and trade funds. To meet the goals of AB32 most directly, I recommend the following criteria for investment of cap and trade funds:

Estimated reduction in CO2/greenhouse gas emissions

Public health benefits—health improvement measured by outcomes such as estimated increased time spent in physical activity, reduction in traffic fatalities/injuries, increased longevity and health care cost savings

Cost effectiveness—cost per ton of CO/2 greenhouse gas emissions reduction

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-12 13:42:15

No Duplicates.

## **Comment 19 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Brian

Last Name: Shafritz

Email Address: shafritz@sbcapcd.org

Affiliation: Santa Barbara County APCD

Subject: Investment of Auction Funds to Reduce GHG from ships

Comment:

The Santa Barbara County Air Pollution Control District is pleased to provide input on use of Cap-and-Trade auction funds, and recommends that some funds be used as an incentive to reduce speeds of large ships along the California coast.

This action addresses the goals of AB 32 immediately and directly. Reducing ship speeds down to 12 knots along the California coast from the current speeds of approximately 20 knots would produce a 50% reduction of greenhouse gases (GHG). 12 knots appears to be a feasible lower limit. Approximately 1.4 million metric tons of GHG reductions would be achieved statewide. This amounts to nearly half of the entire reductions expected from Cap and Trade on a yearly basis.

This action also provides significant public health and business benefits. Particulates (including black carbon), air toxics, and nitrogen oxide emissions would also be reduced by vessel speed reduction, significantly benefiting public health. In addition, coastal communities, and the businesses located in these communities, would be assisted in efforts to attain health-based standards for particulate matter and ozone.

This action supports the state's economy, and furthers a long-term transformative effort to develop a clean-energy economy. Shipping companies docking in California already have to comply with the state's fuel rule and the International Maritime Organization's rules associated with the North American Emission Control Area. An incentive-based program avoids the need for mandatory ship speed reduction, which is under evaluation by the California Air Resources Board, and the National Oceanic and Atmospheric Administration (NOAA). NOAA has implemented mandatory speed-reduction measures along the East Coast, and has been petitioned to regulate speeds on the West Coast, for protection of endangered whales.

Providing incentives to shipping companies would avoid potential costs to the industry of scheduling adjustments, and would support the continued economic health of the ports, an economic engine for all of California. The auction revenue incentives would initially offset increases in scheduling and crew costs, and then substantial annual savings in fuel costs would kick in over the next few years, providing a sustainable incentive for speed reduction.

The action provides other important environmental benefits. Reduced

ship speeds would reduce the risk and severity of ship strikes on endangered blue, fin and humpback whales. NOAA supports this action for its benefits to these whale populations. Slower ships are also quieter ships, reducing ocean noise pollution that negatively affects marine mammals.

The action could be implemented based on an existing model. The Ports of Long Beach and LA already have implemented successful programs that reward shipping operators with incentives for voluntarily reducing ship speeds when approaching the ports. These programs have been in effect for several years, and compliance rates have been very high.

The emission reductions are verifiable and measureable. A network of monitors along the California coast currently tracks ship position and speed. This data can be obtained on a daily basis to ensure ships speeds are in compliance. Additionally, ship fuel consumption data could be reviewed.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/26-scan5867\\_000.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/26-scan5867_000.pdf)

Original File Name: SCAN5867\_000.pdf

Date and Time Comment Was Submitted: 2012-06-12 17:08:31

No Duplicates.

## **Comment 20 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Eric  
Last Name: Kett  
Email Address: seazen@verizon.net  
Affiliation: Sanctuary Advisory Council, CINMS

Subject: Use of Cap-and-Trade Auction Funds to Reduce GHG Emissions and Protect Whales from Ships

Comment:

June 13, 2012

Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street, PO Box 2815  
Sacramento, CA 95812

Re: Investment of Cap-and-Trade Auction Proceeds to Incentivize Large Ocean-Going Vessels to Reduce Speed

Dear Chair Nichols:

As chair of the Channel Islands National Marine Sanctuary Advisory Council, I am writing with regard to the development of an investment plan for the use of cap-and-trade auction proceeds to help reduce greenhouse gases that contribute to climate change. Specifically, the advisory council supports the use of auction proceeds to incentivize large ocean-going vessels to reduce speed.

The advisory council provides advice on management, use and protection of sanctuary waters. The council is comprised of 42 individuals representing the general public, tourism, business, recreational fishing, commercial fishing, non-consumptive recreation, education, research, conservation and Chumash community interests, as well as local, State and Federal government agencies.

At our May 2012 meeting, sanctuary and Santa Barbara Air Pollution Control District staff informed us of the California Air Resources Board (CARB) process to develop the investment plan. Staff further suggested that by allocating some of the auction proceeds to incentivize large ocean-going vessels to reduce their speed off the California coastline, there would be substantial reductions in greenhouse gas emissions and other environmental benefits from slower moving ships.

In a 2009 sanctuary report endorsed by the advisory council(i) we recommended that incentive-based approaches to slow ships down be explored, specifically, to reduce ship strike risks on endangered whales. We are familiar with the successful Vessel Speed Reduction Incentive Program at the ports of Long Beach and Los Angeles that offers monetary-based incentives to slow ships approaching and departing these ports, yielding significant air quality benefits.

Slowing large ocean-going vessels offers a substantial reduction of greenhouse gas emissions as well as reducing nitrogen oxide and sulfur dioxide pollution. Slower ships also provide enhanced protection of marine mammals by reducing noise and ship strike impacts on endangered blue, fin and humpback whales. Therefore, the sanctuary advisory council supports allocating auction proceeds to incentivize large ocean-going vessels to reduce their speed off the California coastline.

A unique and compelling opportunity now arises to develop an incentive-based program focused on reducing ship speeds to address the state's goals under the cap-and-trade program, and help protect endangered whales off our coast. I hope the support of our sanctuary advisory council will be given due consideration as part of the California Air Resources Board's public consultation process.

Sincerely,

/ES/  
Eric Kett, Chair  
Sanctuary Advisory Council(ii)

cc: William J. Douros, Acting Deputy Director, NOAA Office of National Marine Sanctuaries  
cc: Chris Mobley, Superintendent, Channel Islands National Marine Sanctuary  
cc: Brian Shafritz, Manager, Technology and Environmental Assessment Division, Santa Barbara County Air Pollution Control District

enclosure: Channel Islands National Marine Sanctuary Advisory Council voting results, May 18, 2012.

i. ~~Re~~Reducing the Threat of Ship Strikes on Large Cetaceans in the Santa Barbara Channel Region and Channel Islands National Marine Sanctuary: Recommendations and Case Studies. Available online at: <http://channelislands.noaa.gov/sac/pdf/sscs10-2-09.pdf>.

ii. The council is an advisory body to the sanctuary superintendent. The opinions and findings of this letter do not necessarily reflect the position of the sanctuary and the National Oceanic and Atmospheric Administration.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/27-cinms\\_sac\\_carb\\_letter\\_final\\_signed.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/27-cinms_sac_carb_letter_final_signed.pdf)

Original File Name: CINMS\_SAC\_CARB\_Letter\_Final\_Signed.pdf

Date and Time Comment Was Submitted: 2012-06-13 15:48:15

No Duplicates.

## **Comment 21 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Joe

Last Name: Liszewski

Email Address: jliszewski@californiareleaf.org

Affiliation:

Subject: Investment of Cap-and-Trade Auction Proceeds

Comment:

California ReLeaf is statewide non-profit organization whose mission is to empower grassroots efforts and build strategic partnerships that preserve, protect, and enhance California's urban forests. We also represent a statewide Network of urban forestry groups that work at the local level to enrich and augment community health through tree planting and tree care.

Since the passage of AB 32, the urban forestry community has been very supportive of the efforts by the state to implement this program, including the strides made by the Air Resources Board over the years. Like so many hear today, we believe AB 32 is an important program that will help to reduce impacts to people and the environment from the effects of climate change.

In regards to the issue immediately before us, we believe that investments must support AB 32 goals and reduce greenhouse gas emissions, and we do not support any expenditure that would jeopardize the overall program.

To this end, we would like to echo the comments provided by The Nature Conservancy and others at the hearing in that we think the Board should identify investments that also promote job creation in the state, special consideration for disadvantaged communities, protection and enhancement of our environment, and improvements to public health.

As a statewide urban forestry organization, we and our membership Network are currently making those investments in local communities and urban environments that reduce GHGs and provide multiple additional benefits. This is, in part, achieved through the strong partnership this community shares with the California Department of Forestry and Fire Protection, and the Strategic Growth Council which currently provide critical funding throughout the state to projects that impact every community.

Specifically, The Urban Forestry Program at CALFIRE and Urban Greening program at the Strategic Growth Council work with local governments and community groups to protect and enhance our natural resources in urban areas. This includes parks and urban recreational space, investments in urban forests, river parkway development, stormwater capture and reuse, green roofs, community gardens, and a number of other nature-based investments that lead to significant GHG benefits that accrue through direct carbon sequestration, energy savings, and through assisting the state in implementing SB 375. As you may have guessed, underserved demand



is a continuing challenge for both of these programs.

For this reason, we hope that the board will identify significant investment in urban ecosystems and green infrastructure, especially with CALFIRE Urban Forestry and the Strategic Growth Council, as priorities as this discussion continues now and in the months that follow.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-13 16:02:50

No Duplicates.

## **Comment 22 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Tom  
Last Name: Kelly  
Email Address: tkelly@kyotousa.org  
Affiliation: KyotoUSA

Subject: Auction proceeds for EE and RE on public schools  
Comment:

A portion of the Cap and Trade Auction proceeds should be dedicated to improving energy efficiencies and installing renewable energy systems in California's public schools.

California has approximately 1,000 school districts with nearly 10,000 K-12 schools serving about 6 million students. Energy costs are a significant part of a district's overall budget, second only to personnel costs. Public schools can be made more energy efficient and are some of the best possible sites for the installation of photovoltaic (PV) systems.

The benefits of better energy management and renewable production on public schools are enormous. The benefits include:

- Significant reductions in greenhouse gases emissions and other toxic air contaminants from fossil fuel electricity generation
- Spurs local economic development which in turn improves the economic well being of the school district
- Reduces utility bills so that more teachers can be hired and programs maintained
- PV projects on schools can include educational components which bring the all aspects of renewable energy into the classrooms and school academies
- Creates local clean energy jobs
- Improves air quality in the areas where the fossil fuel electricity is generated
- Reduces health effects associated with pollution from electricity generation from non-renewable sources
- Demonstrates to our children that we are taking the reality of climate change seriously and are working to address it.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/29-arb\\_cap\\_and\\_trade\\_auction\\_proceeds\\_advice.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/29-arb_cap_and_trade_auction_proceeds_advice.pdf)

Original File Name: ARB Cap and Trade Auction proceeds advice.pdf

Date and Time Comment Was Submitted: 2012-06-13 16:50:03

No Duplicates.

**Comment 23 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Serena  
Last Name: Coltrane-Briscoe  
Email Address: serenabriscoe@yahoo.com  
Affiliation:

Subject: Cap-and-trade investments in agriculture  
Comment:

Chairman Mary Nichols  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairman Nichols and the CARB Board,  
I am a California resident, and advocate for sustainable agriculture. I am writing in support of your efforts to invest cap-and-trade fee revenue in activities that help meet the objectives of AB 32. I strongly support investing a portion of the fee revenues in agricultural activities that reduce greenhouse gas (GHG) emissions, such as agricultural research, grower technical assistance and financial incentives to support climate friendly agricultural practices that also provide environmental and health benefits, such as improved air and water quality.

Sincerely,  
Serena Coltrane-Briscoe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-14 10:23:19

No Duplicates.

## **Comment 24 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Linda

Last Name: Peterson

Email Address: peterson.lj@gmail.com

Affiliation: Beginning Farmer & Rancher Training Prog

Subject: invest in sustainable agricultural solutions to climate change

Comment:

Subject: Cap-and-trade investments in agriculture

Chairman Mary Nichols  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairman Nichols and the CARB Board,

I work as a program coordinator on a beginning farmer & rancher training program.

I am writing in support of your efforts to invest cap-and-trade fee revenue in activities that help meet the objectives of AB 32. I strongly support investing a portion of the fee revenues in agricultural activities that reduce greenhouse gas (GHG) emissions. Such investments in our communities can create jobs, revitalize rural communities and spur innovation.

Potential GHG emission reductions in agriculture are substantial. California farms and ranches can be innovators in renewable energy and energy efficiency. Additionally on-farm conservation practices can reduce fossil fuel use and sequester carbon, including reduced synthetic nitrogen fertilizer use, cover cropping, compost applications, planting of perennial crops and trees, and enhanced rangeland management.

Cap-and-trade revenue should go towards agricultural research, grower technical assistance and financial incentives to support climate friendly agricultural practices that also provide environmental and health benefits, such as improved air and water quality.

Investing in sustainable agriculture will help overcome barriers for innovative producers who achieve real GHG emission reductions. The sooner this potential is recognized and unleashed, the greater the ability of the state's farms and ranches to provide needed climate solutions.

I strongly encourage you to include investments in sustainable agriculture in your investment plan for cap-and-trade revenue.

Sincerely,

Linda Peterson

Program Coordinator  
Sonoma County UCCE

Sonoma County Food System Alliance  
North Coast Regional Food system Network

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-14 10:31:02

No Duplicates.

## **Comment 25 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Liya

Last Name: Schwartzman

Email Address: liya@californiafarmlink.org

Affiliation: California FarmLink

Subject: Cap-and-trade investments in agriculture

Comment:

Chairman Mary Nichols  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairman Nichols and the CARB Board,

I am the Central Valley Regional Coordinator for California FarmLink. California FarmLink is a nonprofit organization that provides farmers with the tools they need to lease and purchase land, access capital, and improve business and financial management skills. We work with a wide range of farmers all across the state; from various backgrounds and ethnicities, working on large and small parcels, identifying as sustainable and conventional.

I am writing in support of your efforts to invest cap-and-trade fee revenue in activities that help meet the objectives of AB 32. I strongly support investing a portion of the fee revenues in agricultural activities that reduce greenhouse gas (GHG) emissions. Such investments in our communities can create jobs, revitalize rural communities and spur innovation.

Potential GHG emission reductions in agriculture are substantial. California farms and ranches can be innovators in renewable energy and energy efficiency. Additionally on-farm conservation practices can reduce fossil fuel use and sequester carbon, including reduced synthetic nitrogen fertilizer use, cover cropping, compost applications, planting of perennial crops and trees, and enhanced rangeland management.

Cap-and-trade revenue should go towards agricultural research, grower technical assistance and financial incentives to support climate friendly agricultural practices that also provide environmental and health benefits, such as improved air and water quality.

Investing in sustainable agriculture will help overcome barriers for innovative producers who achieve real GHG emission reductions. The sooner this potential is recognized and unleashed, the greater the ability of the state's farms and ranches to provide needed climate solutions.

I strongly encourage you to include investments in sustainable agriculture in your investment plan for cap-and-trade revenue.

Sincerely,

Liya Schwartzman  
California FarmLink  
Central Valley Regional Coordinator  
(916) 538-9619  
liya@cafarmlink.org

Follow us.....

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<https://www.facebook.com/pages/California-FarmLink/127920297237919>

Central Valley Blog: [cafarmlinkcentralvalley.org](http://cafarmlinkcentralvalley.org)

Twitter: CVCAFarmLink

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-14 11:14:53

No Duplicates.

**Comment 26 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: penelope

Last Name: whitney

Email Address: penelope.whitney@gmail.com

Affiliation:

Subject: use auction revenue to support climate-friendly ag

Comment:

Please consider investing in agricultural practices that reduce greenhouse gases. I grew up in Tulare in the San Joaquin Valley, and know how difficult it is for farmers to adopt new practices. Meanwhile, agriculture is a contributor to climate change, and to water and air pollution. It can also be a big part of the solution. You should revenue in research, grower t

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-14 14:59:39

No Duplicates.



## **Comment 27 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Jean-Marc  
Last Name: Leininger  
Email Address: jmleininger@gmail.com  
Affiliation:

Subject: Cap-and Trade  
Comment:

I am writing in support of your efforts to invest cap-and-trade fee revenue in activities that help meet the objectives of AB 32. I strongly support investing a portion of the fee revenues in agricultural activities that reduce greenhouse gas (GHG) emissions. Such investments in our communities can create jobs, revitalize rural communities and spur innovation.

Potential GHG emission reductions in agriculture are substantial. California farms and ranches can be innovators in renewable energy and energy efficiency. Additionally on-farm conservation practices can reduce fossil fuel use and sequester carbon, including reduced synthetic nitrogen fertilizer use, cover cropping, compost applications, planting of perennial crops and trees, and enhanced rangeland management.

Cap-and-trade revenue should go towards agricultural research, grower technical assistance and financial incentives to support climate friendly agricultural practices that also provide environmental and health benefits, such as improved air and water quality.

Investing in sustainable agriculture will help overcome barriers for innovative producers who achieve real GHG emission reductions. The sooner this potential is recognized and unleashed, the greater the ability of the state's farms and ranches to provide needed climate solutions.

I strongly encourage you to include investments in sustainable agriculture in your investment plan for cap-and-trade revenue.

Sincerely,

Jean-Marc Leininger

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-14 17:42:10

No Duplicates.



## **Comment 28 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Mike  
Last Name: Sandler  
Email Address: mike@carbonshare.org  
Affiliation: CarbonShare.org

Subject: Follow EAAC advice: 75% Dividends, 25% Investments  
Comment:

See attachment for full comment, excerpt below:

To: California Air Resources Board (ARB)

Regarding the ARB's Plan for Investment of Cap-and-Trade Auction Proceeds, the best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend. Although rebates are already being contemplated for the electricity sector, costs from the carbon price will be passed down to consumers in the industrial and transportation sectors as well. Dividends accomplish the additional goals of AB32 relating to equity, and maximizing additional environmental, economic, and overall societal benefits, and are therefore not legally risky. ARB should work with the Governor to ask State Legislators to amend bill AB1532 (Perez) to include dividends as a potential category for the Air Pollution Control Fund.

Multi-billion dollar infrastructure projects such as high-speed rail are problematic investments because they could easily swallow up all the revenues from cap and trade, yet still be unable to contribute significantly to the state's GHG reduction goals by 2020. A general problem with investments that seek to reduce emissions under the cap is that they simply create space for more emissions by "freeing up" emissions in other sectors under the cap. The ARB should include a discussion of this problem in the Investment Plan.

Despite the above concerns, it is reasonable to set aside 25% of proceeds for investments, as long as 75% goes back to consumers as climate dividends. This follows the advice from the experts of the Economic and Allocations Advisory Committee (EAAC). If state legislators make the dividends taxable, a portion would come back to the State, free of the Sinclair restrictions. Dividends will reimburse the public for their share of revenues from the Commons, and avoid a public perception of climate change as just one more budget item, floating in a sea of eroding social services. Taxable dividends provide benefits for the State and the people of California.

Sincerely,

Mike Sandler

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/35-comment\\_to\\_arb\\_cap\\_trade\\_6-15-12.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/35-comment_to_arb_cap_trade_6-15-12.pdf)

Original File Name: Comment to ARB Cap Trade 6-15-12.pdf

Date and Time Comment Was Submitted: 2012-06-15 08:45:25

No Duplicates.

## **Comment 29 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Sibella

Last Name: Kraus

Email Address: sibella@sagecenter.org

Affiliation: Sustainable Agriculture Education (SAGE)

Subject: Cap-and-trade investments in agriculture

Comment:

Chairman Mary Nichols  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairman Nichols and the CARB Board,

I run a Berkeley-based non-profit organization, which seeks to promote sustainable agriculture and sustainable development. We achieve these goals through a variety of means, including working on joint venture projects such as the Sunol Agricultural Park, creating youth education opportunities, and providing technical assistance to beginning farmers and ranchers.

I am writing in support of your efforts to invest cap-and-trade fee revenue in activities that help meet the objectives of AB 32. I strongly support investing a portion of the fee revenues in agricultural activities that reduce greenhouse gas (GHG) emissions. Such investments in our communities can create jobs, revitalize rural communities and spur innovation.

Potential GHG emission reductions in agriculture are substantial. California farms and ranches can be innovators in renewable energy and energy efficiency. Additionally on-farm conservation practices can reduce fossil fuel use and sequester carbon, including reduced synthetic nitrogen fertilizer use, cover cropping, compost applications, planting of perennial crops and trees, and enhanced rangeland management.

Cap-and-trade revenue should go towards agricultural research, grower technical assistance and financial incentives to support climate friendly agricultural practices that also provide environmental and health benefits, such as improved air and water quality.

Investing in sustainable agriculture will help overcome barriers for innovative producers who achieve real GHG emission reductions. The sooner this potential is recognized and unleashed, the greater the ability of the state's farms and ranches to provide needed climate solutions.

I strongly encourage you to include investments in sustainable agriculture in your investment plan for cap-and-trade revenue.

Sincerely,

Sibella Kraus  
President  
Sustainable Agriculture Education (SAGE)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-15 09:48:55

No Duplicates.

## **Comment 30 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Stacey  
Last Name: Meinzen  
Email Address: staceymeinzen@gmail.com  
Affiliation: Climate Protection Campaign

Subject: investment of cap and trade auction revenues: dividends  
Comment:

Regarding the ARB's Plan for Investment of Cap-and-Trade Auction Proceeds, the best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend. Although rebates are already being contemplated for the electricity sector, costs from the carbon price will be passed down to consumers in the industrial and transportation sectors as well. Dividends accomplish the additional goals of AB32 relating to equity, and maximizing additional environmental, economic, and overall societal benefits, and are therefore not legally risky. ARB should work with the Governor to ask State Legislators to amend bill AB1532 (Perez) to include dividends as a potential category for the Air Pollution Control Fund.

The experts of the Economic and Allocations Advisory Committee (EAAC) recommended ARB set aside 25% of proceeds for investments, as long as 75% goes back to consumers as climate dividends. Dividends will reimburse the public for their share of revenues from the Commons, and provide benefits for the State and the people of California.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-15 12:04:30

No Duplicates.

**Comment 31 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Randy

Last Name: Moore

Email Address: mfarr@arb.ca.gov

Affiliation: US Department of Agriculture - Region 5

Subject: Restoration of Public Forests

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/38-us\\_forest\\_service.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/38-us_forest_service.pdf)

Original File Name: US Forest Service.pdf

Date and Time Comment Was Submitted: 2012-06-15 13:51:11

No Duplicates.



## **Comment 32 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Frank  
Last Name: Lossy  
Email Address: ftlossy322@comcast.net  
Affiliation:

Subject: Investment of Cap-and-Trade Auction Proceeds  
Comment:

To: California Air Resources Board (ARB)

Regarding the ARB's Plan for Investment of Cap-and-Trade Auction Proceeds, the best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend. Although rebates are already being contemplated for the electricity sector, costs from the carbon price will be passed down to consumers in the industrial and transportation sectors as well. Dividends accomplish the additional goals of AB32 relating to equity, and maximizing additional environmental, economic, and overall societal benefits, and are therefore not legally risky.

ARB should work with the Governor to ask State Legislators to amend bill AB1532 (Perez) to include dividends as a potential category for the Air Pollution Control Fund.

The experts of the Economic and Allocations Advisory Committee (EAAC) recommended ARB set aside 25% of proceeds for investments, as long as 75% goes back to consumers as climate dividends. Dividends will reimburse the public for their share of revenues from the Commons, and provide benefits for the State and the people of California.

Sincerely,

FRank T. Lossy, M.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-15 22:48:23

No Duplicates.

## **Comment 33 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Wesley  
Last Name: Walker  
Email Address: wesbaseball22@yahoo.com  
Affiliation:

Subject: AB 32  
Comment:

Chairman Mary Nichols  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairman Nichols and the CARB Board,

I am writing in support of your efforts to invest cap-and-trade fee revenue in activities that help meet the objectives of AB 32. I strongly support investing a portion of the fee revenues in agricultural activities that reduce greenhouse gas (GHG) emissions. Such investments in our communities can create jobs, revitalize rural communities and spur innovation.

Potential GHG emission reductions in agriculture are substantial. California farms and ranches can be innovators in renewable energy and energy efficiency. Additionally on-farm conservation practices can reduce fossil fuel use and sequester carbon, including reduced synthetic nitrogen fertilizer use, cover cropping, compost applications, planting of perennial crops and trees, and enhanced rangeland management.

Cap-and-trade revenue should go towards agricultural research, grower technical assistance and financial incentives to support climate friendly agricultural practices that also provide environmental and health benefits, such as improved air and water quality.

Investing in sustainable agriculture will help overcome barriers for innovative producers who achieve real GHG emission reductions. The sooner this potential is recognized and unleashed, the greater the ability of the state's farms and ranches to provide needed climate solutions.

I strongly encourage you to include investments in sustainable agriculture in your investment plan for cap-and-trade revenue.

Sincerely,

Wesley Walker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-16 22:47:45

No Duplicates.

**Comment 34 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Jennifer  
Last Name: Rubiello  
Email Address: jrubiello@berkeley.edu  
Affiliation:

Subject: Include Sustainable Ag Solutions in Climate Change Policy  
Comment:

Please commit more funds to sustainable agriculture research  
(including small-scale local organic!!). This is an effective and  
needed solution to climate change.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-18 06:39:27

No Duplicates.

**Comment 35 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Reed

Last Name: Hamilton

Email Address: grassvalleygrains@gmail.com

Affiliation:

Subject: reinvesting cap-and-trade funds in organic and sustainable ag

Comment:

I think it will prove extremely valuable in the long run attempt to reduce the state's greenhouse gas emission to put some of the auction proceeds into organic and sustainable agricultural practices. With millions of acres of ag land in the state, sequestering carbon and other greenhouse gases in the soil by funding research and new farming practices can offer big gains. Please put some money into this and let farmers help.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-18 12:40:29

No Duplicates.

## **Comment 36 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: paul

Last Name: relis

Email Address: paulr@crrmail.com

Affiliation: CR&R Incorporated

Subject: cap-and-trade auction proceeds

Comment:

CR&R Incorporated, a waste services company serving more than 45 communities and 2.5 million Southern California customers, recommends that the ARB use auction fund proceeds to support the development of an anaerobic digestion (AD) industry to produce renewable natural gas (RNG) from the organic fraction of the municipal waste stream.

With \$4.52 million in grant assistance from the California Energy Commission (AB 118 funding) CR&R is investing in an AD facility in Perris, Riverside County. This privately financed facility will convert municipal organic waste to RNG. The RNG will power an estimated 60 or more waste collection trucks and street sweepers serving municipalities that CR&R contracts with for services. Assuming the project meets its operational and financial objectives it will be scaled up. It's estimated that if CR&R is able to convert 450 of its 700 vehicle fleet about 60,000 metric tons of GHG emissions reductions will follow.

CR&R's AD project is scheduled for completion in early 2014. Project permitting will be completed this fall.

There are about 6 million tons of food and other organic wastes produced each year in California that are suitable for conversion to RNG. ARB staff analyses establish that RNG is the cleanest burning transportation fuel, some six times cleaner than natural gas. In Germany, RNG is currently being captured from some 7,000 AD plants in that country. By 2030 Germany estimates that it will produce 12% of its liquid transportation fuel from AD generated RNG.

Given the contribution that AD can make towards realizing AB 32 GHG reductions, the importance of renewable fuel to California's transportation sector, and that the RNG fuel source is California grown and sustainable, carbon trading auction proceeds should clearly be made available for AD development. Proceeds from the cap-and-trade program would augment zero carbon fuel incentives from the Low Carbon Fuel Standard and favorable tax credits for RNG creating a needed new incentive for the development of a California-grown AD industry.

From a project criteria perspective CR&R believes that renewable energy industrial development in California should receive carbon trading auction proceeds based on its synergistic economic and environmental benefits to the state. Synergistically AD development fits the bill. It results in significant GHG reductions, uses local

generated feedstocks to produce the fuel, and produces a soil amendment that will enrich California's landscape and agricultural sectors.

An AD industry will produce thousands of high-paying construction jobs and add a sophisticated, capital intensive new green industry in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-18 15:49:14

No Duplicates.

## **Comment 37 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Gladwyn

Last Name: D'Souza

Email Address: godsouza@mac.com

Affiliation: Sustainable San Mateo County

Subject: Cap and trade funding criteria

Comment:

Please fund

- active transportation by providing funds to cities that have complete streets policies
- restored grasslands, marshes, waterways, and forests that can be sustainably gleaned within the commons for cities with transfer of development rights.
- backyard agriculture as a component of an urban food system for cities with local food ordinances that remove zoning restrictions on urban agriculture
- micro grids linking energy and water for 100% wind water and solar using off the shelf technology
- closed loop on waste for cities that have tier priced service by volume and distance.

And provide tradeable carbon credits to cities to motivate changes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-18 22:35:30

No Duplicates.



**Comment 38 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Gladwyn

Last Name: D'Souza

Email Address: godsouza@mac.com

Affiliation: Sustainable San Mateo county

Subject: Cap and trade revenue use policy

Comment:

If the emission savings can't be reliably quantified within the goal from CARB, then use the cap and trade revenue to permanently retire emission permits thus tightening the cap.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-18 22:46:12

No Duplicates.

## **Comment 39 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: Transition Assistance for Highly Trade Exposed Industries

Comment:

GPI would like to echo the suggestions made during the May 24 ARB workshop to use some of the auction proceeds for project grants to highly trade exposed industries covered under the cap and trade program. As members of the paper and paperboard industry, we are highly trade exposed, producing a commodity product under very high competitive pressures outside California as well as from overseas.

Studies of our industry have shown that our industry is beset by foreign competition benefiting from extraordinary subsidies, tax incentives, and low interest loans from their governments (China and Korea), as well as price dumping here in the US.

We propose that some portion of the auction proceeds be used to help highly trade-exposed industries fund greenhouse gas (GHG) projects that reduce these emissions toward the 2020 state GHG goal. Industries like ours are having a difficult time funding future GHG projects while remaining competitive on the business front. Setting aside some funds for project grants would help ease these competitive concerns while moving our facilities toward a smaller GHG footprint. We don't expect a grant program to solve all of our issues with foreign competitors, but it will ensure that California's cap and trade program does not exacerbate them. Without some of these auction proceeds flowing back to industry in some form of assistance, we feel the cap and trade program becomes an expensive tax program on California businesses, some of which are highly trade exposed and provide solid jobs to our state's citizens.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-19 14:01:54

No Duplicates.

**Comment 40 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Jamie  
Last Name: Song  
Email Address: jsong@meca.org  
Affiliation: MECA

Subject: MECA's Public Comments on Investment of Cap-and-Trade Auction Proceeds  
Comment:

To Whom It May Concern:

Please find attached the Manufacturers of Emission Controls Association's (MECA) public comments on ARB's Investment of Cap-and-Trade Auction Proceeds.

Sincerely,  
Jamie Song

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/48-meca\\_comments\\_on\\_arb\\_capandtrade062012.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/48-meca_comments_on_arb_capandtrade062012.pdf)

Original File Name: MECA comments on ARB CapandTrade062012.pdf

Date and Time Comment Was Submitted: 2012-06-20 08:04:32

No Duplicates.

**Comment 41 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Grant

Last Name: Davis

Email Address: grant.davis@scwa.ca.gov

Affiliation: Sonoma County Water Agency

Subject: May 24 Workshop on Cap-and-Trade Revenue Investments

Comment:

Please see comments on investment of cap-and-trade revenue by Grant Davis of the Sonoma County Water Agency as attached.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/49-scwa\\_comments\\_ab32\\_auction\\_proceeds\\_investment\\_061912.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/49-scwa_comments_ab32_auction_proceeds_investment_061912.pdf)

Original File Name: SCWA COMMENTS AB32 AUCTION PROCEEDS INVESTMENT 061912.pdf

Date and Time Comment Was Submitted: 2012-06-20 13:38:41

No Duplicates.

## **Comment 42 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Christopher  
Last Name: Williamson  
Email Address: [chris.williamson@ci.oxnard.ca.us](mailto:chris.williamson@ci.oxnard.ca.us)  
Affiliation: City of Oxnard

Subject: Allocation Cap-and-Trade Proceeds  
Comment:

Dear CARB:

The City of Oxnard is a blue-collar; minority-majority city of 200,000 located about 60 miles northwest of Los Angeles. Like most local governments, we know what to do to reduce GHG emissions. What we need is a regular source of funding to implement our programs that does not require repeated development of lengthy proposals, competition with larger and wealthier jurisdictions that can afford professional grant writers, and the repeated risk of starting a CAP-related program that, if funded, that has no permanent funding source.

The proceeds of the Cap-and Trade auctions are a recurring source of funds that should be earmarked to implement the goals of AB32. We strongly encourage that a significant minimum amount and/or fixed percentage of the Cap-and-Trade proceeds be set aside for CDBG-like formula grants based on population and economic status to city and county governments to implement policies and programs from locally-adopted Climate Action Plans. If a jurisdiction has no CAP, then CARB would have a list of approved programs such as installing PEV charging stations, insulating older buildings, installing renewable energy generating equipment, and establishing an urban forest for sequestration credits.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/50-city\\_of\\_oxnard\\_letter\\_to\\_carb\\_june\\_20\\_2012.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/50-city_of_oxnard_letter_to_carb_june_20_2012.pdf)

Original File Name: City of Oxnard letter to CARB June 20 2012.pdf

Date and Time Comment Was Submitted: 2012-06-20 13:37:31

No Duplicates.

**Comment 43 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Raymund  
Last Name: Gallian  
Email Address: rgallian@comcast.net  
Affiliation: Sonoma Biochar Initiative

Subject: Biochar funding under Cap and Trade  
Comment:

RE: CAP-AND-TRADE INVESTMENTS IN BIOCHAR FOR AGRICULTURE

Dear Chairman Nichols and the CARB Board,

As advocates for Biochar, a climate response tool and a material to benefit agriculture, we write in support of your efforts to invest cap-and-trade fee revenue in activities that help meet the objectives of AB 32. We strongly support investing a portion of the fee revenues in agricultural activities that reduce GHG emissions and actively sequester carbon. Such investments in our communities can create jobs and spur innovation.  
(for rest- see attachment)

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/51-carb\\_c\\_t-sbi\\_6-21-12comments.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/51-carb_c_t-sbi_6-21-12comments.pdf)

Original File Name: CARB C&T-SBI 6-21-12comments.pdf

Date and Time Comment Was Submitted: 2012-06-21 12:51:56

No Duplicates.

**Comment 44 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Senator Noreen

Last Name: Evans

Email Address: mfarr@arb.ca.gov

Affiliation:

Subject: Cap-and-Trade Investments in Sustainable Agriculture

Comment:

See attached...

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/52-senator\\_noreen\\_evans\\_office.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/52-senator_noreen_evans_office.pdf)

Original File Name: senator Noreen Evans Office.pdf

Date and Time Comment Was Submitted: 2012-06-21 13:43:41

No Duplicates.

**Comment 45 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Jack P.  
Last Name: Broadbent  
Email Address: mfarr@arb.ca.gov  
Affiliation: Bay Area AQMD

Subject: Investment of Cap-and-Trade Auction Proceeds  
Comment:

See Attached...

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/53-bay\\_area\\_aqm\\_district.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/53-bay_area_aqm_district.pdf)

Original File Name: Bay Area AQM District.pdf

Date and Time Comment Was Submitted: 2012-06-21 13:46:48

No Duplicates.



**Comment 46 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Andrea

Last Name: Mackenzie

Email Address: mfarr@arb.ca.gov

Affiliation: Santa Clara County Open Space Authority

Subject: AB 32 Cap and Trade Program Auction Proceeds Investment Plan

Comment:

See Attached...

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/54-santa\\_clara\\_open\\_space\\_authority.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/54-santa_clara_open_space_authority.pdf)

Original File Name: Santa Clara Open Space Authority.pdf

Date and Time Comment Was Submitted: 2012-06-21 13:52:11

No Duplicates.

**Comment 47 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Elyse W. and Kathlee

Last Name: Lowe and Ferrier

Email Address: mfarr@arb.ca.gov

Affiliation: Move San Diego and WalkSanDiego

Subject: Investment of Auction Funds from CA Cap-and-Trade Program Toward Improving  
Transportation

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/55-movewalk\\_sandiego.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/55-movewalk_sandiego.pdf)

Original File Name: MoveWalk\_SanDiego.pdf

Date and Time Comment Was Submitted: 2012-06-21 14:01:37

No Duplicates.

## **Comment 48 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Shulock

Email Address: shulockconsulting@comcast.net

Affiliation: Shulock Consulting

Subject: Framework for investment of AB 32 auction proceeds

Comment:

This comment provides preliminary observations on the overall structure of the evaluation process, i.e. how to frame the discussion to best address the various competing priorities. In brief, it recommends that the evaluation process (at ARB and/or the Legislature):

1. Start by defining a clear, limited set of desired objectives for the use of the funds,
2. Determine the criteria that are appropriate to apply for each objective (which, notably, need not be the same across all objectives), and
3. Apply the appropriate criteria to candidate funding proposals for each objective.

More detail is provided in the attachment.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/56-response\\_to\\_arb\\_request\\_for\\_public\\_input--shulock.docx](http://www.arb.ca.gov/lists/investmentplan-ws/56-response_to_arb_request_for_public_input--shulock.docx)

Original File Name: Response to ARB Request for Public Input--Shulock.docx

Date and Time Comment Was Submitted: 2012-06-21 14:10:10

No Duplicates.

**Comment 49 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Janet

Last Name: Bell

Email Address: jbell@mwdh2o.com

Affiliation: Metropolitan Water District

Subject: Comments Letter on Cap-and-Trade Auction Proceeds

Comment:

Please see attached comments letter from Metropolitan Water District of Southern California in response to "Public Consultation on Investment of Cap-and-Trade Auction Proceeds."

Thank you for the opportunity to provide input.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/57-bk\\_carb\\_ctauctionrevenue\\_jun2222012\\_commentsletter.finalsigned.externaltocarb.comments.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/57-bk_carb_ctauctionrevenue_jun2222012_commentsletter.finalsigned.externaltocarb.comments.pdf)

Original File Name: BK\_CARB CTauctionrevenue jun2222012\_commentsletter.finalsigned.externaltoCARB.comments.pdf

Date and Time Comment Was Submitted: 2012-06-21 14:21:48

No Duplicates.

**Comment 50 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Muriel

Last Name: Strand, P.E.

Email Address: [auntym@earthlink.net](mailto:auntym@earthlink.net)

Affiliation:

Subject: Priorities for Investment of Cap-and-Trade Auction Proceeds

Comment:

attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/58-invest\\_cap\\_trade\\_proceeds.doc](http://www.arb.ca.gov/lists/investmentplan-ws/58-invest_cap_trade_proceeds.doc)

Original File Name: invest cap&trade proceeds.doc

Date and Time Comment Was Submitted: 2012-06-21 16:14:48

No Duplicates.

**Comment 51 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Brenda

Last Name: Coleman

Email Address: [brenda.coleman@calchamber.com](mailto:brenda.coleman@calchamber.com)

Affiliation: California Chamber of Commerce

Subject: CalChamber Comments RE: Public Consultation on Investment of C&T Auction Proceeds

Comment:

Please see attached.

Brenda M. Coleman

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/59-ct\\_auction\\_expenditures\\_comments\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/59-ct_auction_expenditures_comments__2_.pdf)

Original File Name: CT Auction Expenditures Comments (2).pdf

Date and Time Comment Was Submitted: 2012-06-21 16:16:32

No Duplicates.

**Comment 52 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Ann

Last Name: Chan

Email Address: ann\_chan@tw.s.org

Affiliation: The Wilderness Society

Subject: TWS Comments on Investment of Cap-and-Trade Auction Proceeds

Comment:

The Wilderness Society appreciates this opportunity to provide further comments on investment of cap-and trade auction proceeds. The cap-and-trade program offers an opportunity for California to make critically needed, transformative natural resource investments to further the goals of AB32 and address the serious threats that global warming poses to the economic well-being, public health, and environment of California.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/60-tws\\_comments\\_on\\_investing\\_cap\\_and\\_trade\\_auction\\_proceeds.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/60-tws_comments_on_investing_cap_and_trade_auction_proceeds.pdf)

Original File Name: TWS comments on Investing Cap and Trade Auction Proceeds.pdf

Date and Time Comment Was Submitted: 2012-06-21 21:28:05

No Duplicates.

**Comment 53 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Timothy  
Last Name: OConnor  
Email Address: toconnor@edf.org  
Affiliation: EDF

Subject: Invest to Grow - EDF Comments on Use of Allowance Proceeds  
Comment:

Please accept the attached report as EDF's comments on the investment of AB 32 cap-and-trade auction proceeds.

The report, entitled "Invest to Grow," highlights opportunities for California to strategically invest AB 32 proceeds to reduce greenhouse gas emissions while growing our clean and efficient economy. The targeted investments of AB 32 proceeds we outline can accelerate economic growth in sectors that put Californians to work and help the state protect the environment and public health.

EDF looks forward to working with you and your staff as CARB develops an investment plan. Please do not hesitate to contact me with any questions.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/61-invest\\_to\\_grow\\_-\\_edf\\_-\\_final\\_june\\_22\\_2012.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/61-invest_to_grow_-_edf_-_final_june_22_2012.pdf)

Original File Name: Invest to Grow - EDF - FINAL June 22 2012.pdf

Date and Time Comment Was Submitted: 2012-06-22 00:35:31

No Duplicates.



**Comment 54 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Alan

Last Name: Holm

Email Address: holmsale@aol.com

Affiliation: none but conservative/libertarian

Subject: cap & trade

Comment:

I do not believe in phony trades which do nothing to clean the air  
but make people feel good.

I believe in freedom & I understand discussion was stopped on this  
issue with public protest.

I vote.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:26:45

No Duplicates.

**Comment 55 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Curt

Last Name: leake

Email Address: curtleake@comcast.net

Affiliation:

Subject: cap and trade

Comment:

screw cap and trade in the US and screw the greenies. 5

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:28:19

No Duplicates.

**Comment 56 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Kurt

Last Name: Schellenbach

Email Address: disklixik\_kurts@yahoo.com

Affiliation:

Subject: No Cap and Trade!

Comment:

This has got to be the dumbest idea devised by government ever. After you sink the California economy, destroy peoples wealth and drive them out of the state, what will you have left? Only the people getting welfare benefits, paying high energy prices. It's a joke. The voters have one more chance to turn this around, and eliminate the CARB. Green is the new Red!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:29:42

No Duplicates.

**Comment 57 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Michael

Last Name: Bell

Email Address: bellevent@gmail.com

Affiliation: Bell Event Services

Subject: Cap-and-Trade Auction

Comment:

Please stop hurting CA small businesses. Please stop making it easier to leave the state and compete somewhere else. Please help this state to grow again. I am am a small business and employ people in this state. You are regulating me out of business. Stop these Cap and Trade policies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:28:35

No Duplicates.

**Comment 58 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Barbara  
Last Name: Samardich  
Email Address: asbs@sierraemail.com  
Affiliation:

Subject: Cap and Trade  
Comment:

The present policy regarding Cap and Trade in the bankrupt State of California is another indication of the failure of leadership in this State. How can you even consider this, when the average person is jobless, has no means of support and has to depend upon the largess of government programs and charitable acts? If I had a vote on which agencies to get rid of - the EPA would top the list on a State and Federal level.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:41:20

No Duplicates.

## **Comment 59 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Karla  
Last Name: Garofalo  
Email Address: karla.garofalo@ferguson.com  
Affiliation:

Subject: Cap and Trade  
Comment:

The new energy tax is not only unnecessary, nut will cost California new Business, but will cost California Taxpayers their employment. No Taxpayers, no income for CA.

If this passes,new Business and existing businesses will move out of California in droves. Most Likely to nearby Nevada, where they are given incentives to open. More new legislation is not the answer to California's deficit. It only compounds the problem.

Balance the budget-then worry about new legislation.

California is the last state to see improvement in our economy, and this will continue to be true until Politicians realize that new taxes are not the answer.

There needs to be a complete audit of the State's finances, including the CA Lottery and politicians need to be held accountable for misuse of funds.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:42:03

No Duplicates.

**Comment 60 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Brady

Last Name: Lee

Email Address: bbargenquast@yahoo.com

Affiliation:

Subject: Cap and Trade Tax

Comment:

I see this as an extra tax that will greatly hurt California businesses, which are already suffering now. I am making plans to move my business out of California to North Carolina as I can no longer compete in this state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:52:04

No Duplicates.

## **Comment 61 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Jim

Last Name: Stewart

Email Address: Jim@earthdayLA.org

Affiliation: Earth Day Los Angeles

Subject: Earth Day Los Angeles Input on Investment of Cap-and-Trade Auction Proceeds  
Comment:

Earth Day Los Angeles Input on Investment of Cap-and-Trade Auction Proceeds

The California Air Resources Board has asked for input for an investment plan for the auction proceeds from the cap-and-trade program to meet the goals of Assembly Bill 32 (AB 32).

A group of environmental and social justice organizations developed joint input for the California Public Utilities Commission's similar question of how to invest the allowance revenues from the cap-and-trade program for electricity generation. The groups included: Natural Resources Defense Council, Sierra Club California, The Greenlining Institute, Union of Concerned Scientists, Local Government Sustainable Energy Coalition, National Consumer Law Center, Climate Protection Campaign, California Housing Partnership Corporation, and Community Environmental Council.

Attached are the initial and reply comments jointly submitted by these groups in the CPUC proceeding R. 11-03-012, along with the Appendices and Exhibits. Although not all the details relate to the Air Resources Board, many of the main points do apply, including prioritizing investment in three broad categories: (1) expanding energy efficiency programs, including developing innovative financing strategies to support emerging clean energy technologies and implementation strategies; (2) expanding low and moderate energy efficiency programs; and (3) enabling better interconnection, integration and support for distributed renewable generation.

The environmental and social justice groups' proposal also highlights a series of carbon mitigation activities facing market barriers that auction revenues could help address, and identify opportunities to supplement current programs to capture additional, untapped energy savings.

The proposal also asked that investments under each strategy are additional to programs and expenditures otherwise necessary to meet existing legal and regulatory requirements, prioritize investments in California's most impacted and disadvantaged communities and non-commercial entities that provide vital social services such as local governments, schools, universities, hospitals, federal and agencies, and community-based organizations.

In addition, implementation should facilitate customer



understanding, engagement and support for California's climate programs. For example, any revenues to individuals (including low income households) should be in the form of a separate off-bill rebate, not merely deducted from their bill.

Included in the attached zip file are the following:

Revised Proposal, filed 1-6-12

Opening Comments, filed 1-31-12

Reply Comments, filed 2-14-12

Of particular interest are the many footnoted references, plus the Appendices and Exhibits:

Appendix A: Disproportionate Impacts of Climate Change on Low Income Households

Appendix B: Illustrative Local Government Programs

Appendix C: Expanded Multifamily Residential Energy Efficiency Programs

Exhibit 1: The Climate Gap - Inequalities in How Climate Change Hurts Americans and how to Close the Gap

Exhibit 2: Climate Change, Extreme Heat, and Electricity Demand in California

Exhibit 3: Pie in the Sky? The Battle for Atmospheric Scarcity Rents

Exhibit 4: Cap and Dividend: How to Curb Global Warming While Protecting the Incomes of American Families

Exhibit 5: Clear Economics: State-Level Impacts of the Carbon Limits and Energy for America's Renewal Act on Family Incomes and Jobs

Exhibit 6: Schools of the Future Report

Exhibit 7: Improving California's Multifamily Buildings: Opportunities and Recommendations for Green Retrofit & Rehab Programs

Exhibit 8: Investment of Proceeds from RGGI CO2 Allowances

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/69-enviroejgroupproposals.zip](http://www.arb.ca.gov/lists/investmentplan-ws/69-enviroejgroupproposals.zip)

Original File Name: EnviroEJGroupProposals.zip

Date and Time Comment Was Submitted: 2012-06-22 08:06:53

No Duplicates.

**Comment 62 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Richard  
Last Name: Gormley  
Email Address: richg916@gmail.com  
Affiliation: Semi-retired CPA

Subject: Cap & Trade  
Comment:

There is no doubt that this measure will drive more businesses from California resulting in job losses and decreased tax revenues. This is more insidious than the bullet train from Fresno to Bakersfield. We have a government that is out of control and out of touch.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:02:30

No Duplicates.

## **Comment 63 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Chris

Last Name: Mertens

Email Address: [chris@csgcalifornia.com](mailto:chris@csgcalifornia.com)

Affiliation:

Subject: Clean Energy Group - Auction Revenue Comments - May 24th Workshop Follow Up  
Comment:

The clean energy businesses, industry groups, advocates, and investors listed below wish to submit the attached comments as a follow up from the May 24th, 2012 workshop on Cap and Trade auction revenue investments.

- Solar Energy Industries Association
- CALSTART
- Tendril Inc.
- Mohr Davidow Ventures
- Simbol Materials
- TechNet
- Solaria
- DBL Investors
- SolarCity
- Bloom Energy
- Clean Tech San Diego
- Sunrun Inc.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/71-clean\\_energy\\_group\\_-\\_auction\\_revenue\\_investment\\_-\\_comments.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/71-clean_energy_group_-_auction_revenue_investment_-_comments.pdf)

Original File Name: Clean Energy Group - Auction Revenue Investment - Comments.pdf

Date and Time Comment Was Submitted: 2012-06-22 08:17:36

No Duplicates.

## **Comment 64 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Ron

Last Name: Arteno

Email Address: ArtenoRT@netptc.net

Affiliation: Central Valley Tea Party

Subject: Effects of AB 32 on Agriculture in the Central Valley

Comment:

This is my observation how CARB is crippling California...  
Symposium, October 18, 2011. Fresno Chamber of Commerce. Hosted by:

29th District Assembly member Linda Halderman, Chair of the  
Legislative Rural Caucus

30th District Assembly member David Valadao, Member LRC

32nd District Assembly member Shannon Grove, Member LRC

Mona Shulman - Pacific Coast Producers, Corporate Compliance and  
Governance

Ben Curti - Dairymen and Director of Land-O- Lakes Advisory Board

Marian Balaster - Olan Spices and Vegetables

Dorene (Dee Dee) D'Adamo - CARB/ Ag Air Quality Adv. Board.

Mona, Ben and Marian talked about the effects and impact of AB 32, California's Cap and Trade law upon their industry. The common conclusion is all of the C&T Regulations only deal with California and not other states or nations. Modification to their industry is costly with minimal impact upon our Air Quality. C&T is unpredictable to their budgets regarding purchase of carbon credits and corresponding carbon restriction days, usually in summer heat which traps pollution in the Central Valley. Air Alert episodes will be declared during summer when conditions are conducive for ozone formation. When that occurs, the Air District urges residents and businesses to put air-friendly practices into place that may avert an exceedance. The industry has done nearly all it can technologically do to reduce their carbon footprint. Their only resort now is to reduce the production of food. This has been cleverly labeled "Leakage Risk" and CARB, the California Air Resource Board, has dictated levels: high, medium and low. Leakage Risk equates to forced industry shut downs, loss of production, loss of jobs and loss of food, measured in metric tons. The far reaching effect of C&T also will impact the energy production industry, but again, only in California as the cost of energy in the future will sky rocket in an effort to further clean our air.

August, 2011 was the first time in recorded history that the San Joaquin Valley air basin did not incur an exceedance for the standard. Exceeding the 1-hour ozone standard triggers federal monetary penalties. Because of a handful of exceedances in 2010, the air basin was assessed a \$29 million penalty, which will be paid through fees on Valley businesses and residents. In order to reach attainment and remove a \$29 million federal penalty, each of the air basin's monitoring stations must not exceed the ozone threshold of 125 ppb more than three times in three years. This year was the longest the Valley had gone without exceeding the

standard, yet with Clovis exceeding the limits at the very end of the 2011 ozone season, the Valley cannot show attainment until 2013, the district says. This penalty does not recognize the incredible improvements we have made across the board in our air quality.

The symposium was also attended by Dorene D'Adamo (Dee Dee) of the California Air Resource Board and AG Air Quality Advisory Board member. She is an environmental lawyer married to a farmer! While she acknowledged the importance of Ag trade in the Central Valley to the world, she believes the global warming concept that mankind can effect global temperature. California is the only state in the nation experimenting with C&T. The point was made about displaced industry moving to China, in which it's pollution is 4 days away from reaching California. The abandoned industries will move to other states or nations with loss of a multi-Billion dollar industry to California. Ag production will be reduced or even cease and air quality will be minimally impacted. More loss of jobs, less use of natural resources. More poverty and hunger. Mrs. D'Adamo appeared unsympathetic and arrogant to industry concerns. Several in the audience thanked her for her considering high level Leakage Risks which was like a child thanking a parent for not beating them again! The only solution will be legislation that will reverse or slow down AB 32 like the failed 2008 Prop 23 which stopped AB 32 until a 5.5% State unemployment rate was attained for 4 consecutive quarters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:14:41

No Duplicates.

**Comment 65 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Daniel  
Last Name: Gruber  
Email Address: danielmgruber@hotmail.com  
Affiliation:

Subject: Cap & Trade  
Comment:

Respectfully sirs, this is a huge nail in the coffin of business owners in California. When are you going to realize that businesses are not a never ending source for California's uncontrolled spending habits. At some point very soon, the call of the sane and business gracious locations will win. Business benevolent = good paying jobs = employee purchasing = increased revenue..... One of the highest taxed, over regulated, business negative states in the nation. When are you going to wake up???

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 07:49:00

No Duplicates.

**Comment 66 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Rex  
Last Name: Roden  
Email Address: rexroden@zetabb.com  
Affiliation: ACCC

Subject: California Cap & Trade  
Comment:

"An unelected and unaccountable bureaucracy named CARB is getting ready to impose a \$143 billion energy tax on us all" Why are you doing this to the people of California? I hope this message doesn't get disregarded like the folks who wanted to speak at the May public meeting that Queen Mary so abruptly shut down.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:27:50

No Duplicates.

## **Comment 67 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Heath

Last Name: Hatheway

Email Address: heathhatheway@gmail.com

Affiliation:

Subject: Cap and Trade

Comment:

I want to send in my comments that what you are proposing to do will damage the California economy and cost taxpayers \$143 billion by your own numbers. I am quite certain that you came up with that number using a static analysis and it will end up costing us much more. This cap and trade will drive California's economy further into recession and cost us at least 1.6 million jobs (again your numbers which I am sure is too low)! You are supposed to serve the citizens of California and not damage them. What business in their right mind would come here or expand here with regulations like this? Why are you doing this? Global warming? There has been no warming in the last decade. Or maybe global cooling? That theory that died in the 70's? Perhaps "Climate Change"? Where is the proof that man made pollutants are the cause? The Hadley research Center in East Anglia? They were proven to be a bunch of fraud as was Michael Mann and his hockey stick graph! How can you know that the temperature the earth is at now is the optimum? You can't! There were article written around 1900 saying there was global warming... The satellite data show that there is now warming so why do this? You must do the right thing for the people that you serve and not go forward with this economic suicide pact. That is unless your real goal is to have California fail...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:25:56

No Duplicates.



## **Comment 68 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Valerie  
Last Name: Brown  
Email Address: suzsmith@sctainfo.org  
Affiliation: Chair, SCTA/RCPA

Subject: Public consultation on investment of cap and trade auction proceeds  
Comment:

June 12, 2012

Mary Nichols, Board Chairman  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE:Public consultation on investment of cap and trade auction proceeds

Dear Ms. Nichols:

The Sonoma County Transportation Authority (SCTA) and Regional Climate Protection Authority (RCPA) appreciate the opportunity to comment on the proceedings related to use of cap and trade auction proceeds.

The SCTA serves as the countywide transportation planning and funding agency in Sonoma County. In that capacity the SCTA has been actively engaged in numerous efforts to reduce GHG emissions from the transportation sector. The RCPA is a legislatively created, countywide body of local government officials charged with coordinating and implementing climate change activities throughout Sonoma County and to advocate on issues relevant to the role of government and the reduction of GHG emissions. The SCTA and RCPA share a Board of Directors made up of local elected officials from each of the 10 jurisdictions in Sonoma County.

In response to the May 24, 2012, public consultation meeting held in Sacramento, the SCTA/RCPA would like to offer comments from both a transportation and local government perspective on the two questions posed.

How can California effectively invest the auction funds to meet the goals of Assembly Bill 32 (AB 32) including support of long-term, transformative efforts to improve public health and develop a clean energy economy?

The SCTA/RCPA recommends the following principles when considering expenditure of the auction funds:

- 1.The Air Resources Board should, working in conjunction with other State and local government agencies, develop a multi-year expenditure plan to outline the priorities for the use of

cap-and-trade revenue. The expenditure plan should include objectives and performance measures that link the expenditure of funds to reduction in greenhouse gas emissions based on certain criteria.

2.The expenditure plan should seek to enhance or maximize other benefits to California, including improved mobility, livability, public health, economic vitality and social equity.

3.Transportation Sector:

a.Given the importance of reducing emissions in the transportation sector, a significant amount of anticipated revenue should be directed towards projects that reduce transportation-related emissions.

b.This objective would enhance the implementation of Senate Bill 375 (SB375) and encourage the linkages between transportation, land use, housing and healthy communities as well as connectivity between modes of transportation.

c.The expenditure plan should provide direct investment into transportation infrastructure, operations and maintenance with an eye toward integrating those investments into a true user-friendly system that is not just automobile-reliant.

4.Energy Sector:

a.Energy efficiency, renewable energy and the water/energy nexus represent the key areas where emission reductions can be derived from the energy sector and the built environment.

b.The objective of minimizing emissions from the built environment will encourage comprehensive long term planning as well as lead to innovations in land use planning, zoning ordinances and building codes. In addition, retrofitting our existing buildings and systems can be done more immediately to provide emission reductions.

c.The expenditure plan should continue and expand upon existing efforts such as Energy Upgrade California, zero carbon water, Build it Green, property assessed clean energy programs and other incentive and financing tools that target retrofitting buildings and systems and planning for the future built environment.

5.Conservation Sector:

a.Protecting the natural environment and critical resources while preparing to adapt to climate change impacts are the flip side of addressing the built environment.

b.The objective of addressing conservation and adaption needs should include open space protection, investment in working forests, river parkway development, wetland protection and development, bio-char options to address vegetative waste and a number of other nature-based investments that lead to significant GHG benefits.

c.The expenditure plan should engage and fund local governments to develop and implement conservation efforts that help protect our critical resources and address adaptation issues.

6.The expenditure plan should build upon the many diverse efforts currently underway to implement emission reduction projects and programs. There are excellent examples from all of the sectors and at all levels of government.

7.The expenditure plan should direct funds to local government to serve as implementers on behalf of the State.

What criteria should be prioritized in the development of an investment plan for auction funds and why?

The SCTA/RCPA recommends the following criteria be considered in the development of an investment or expenditure plan:

1. Deliverability - can a project, program or policy be implemented quickly and provide benefits both immediately and over the long term?

2. Measurable benefits - does a proposed project, program or policy demonstrate quantifiable reductions in emissions?

3. Geographic equity - will rural, suburban and urban areas see equitable benefit from the expenditure plan?

4. Diversity - are needs and values of different communities addressed when it comes to prioritizing projects, programs and policies?

5. Balance - how will a project, program or policy balance economic value with environmental benefit to maximize mobility, livability, public health, economic vitality and social equity?

Thank you for your consideration and we look forward to working with you throughout this process.

Sincerely,

Valerie Brown  
Chair, SCTA/RCPA

CC: Sonoma County Legislative Delegation  
SCTA/RCPA Board of Directors

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:37:27

No Duplicates.

**Comment 69 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Adam

Last Name: Baillie

Email Address: adambaillie@yahoo.com

Affiliation: Independent

Subject: Do not implement Cap and Trade

Comment:

Please do not institute a Cap and Trade policy in this State. This is a "job killer" and another unnecessary tax on business and California citizens. This State does not need to continue to institute plans that cause businesses to move to other States like Texas and Nevada and taking the jobs with them. All this is, is a TAX!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:36:24

No Duplicates.

**Comment 70 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: tat

Last Name: wong

Email Address: ghostwong@aol.com

Affiliation:

Subject: What are you doing

Comment:

I am opposed to your jack booted regulations in the Sate of California. You will end up killing what is left of the California workforce, and cause more business to leave.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:44:40

No Duplicates.

**Comment 71 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Robert

Last Name: Hren

Email Address: bob\_hren@yahoo.com

Affiliation:

Subject: Cap and Trade

Comment:

I urge CARB to abandon their proposed cap and trade program before irreparable harm is done to California's fragile economy. By going alone, CA will see the many more high quality companies and jobs flee to other more rational states. This will drive down the revenue to all levels of government, lower depressed property values even more, and cause other folks, like me, to consider retirement in another state. This is a foolish plan for California that will not have any measurable impact on global climate change. It will, however, result in a massive transfer of wealth from Californians to out-of-state business interests who will profit from trading and credits. This is a job-killer program that must be abandoned.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:40:24

No Duplicates.

**Comment 72 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Tom  
Last Name: Eaton  
Email Address: tgeaton49@yahoo.com  
Affiliation:

Subject: CAP AND TRADE  
Comment:

Members of CARB,

You are ruining what was the finest, most productive state in the nation by trying to clean up the world's air on the backs of California citizens. We can't afford anymore taxes, fees or any other increases to our family and/or business budgets.

There is NO way to keep our clean air in or to keep our surrounding states dirty air out!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 08:47:19

No Duplicates.

**Comment 73 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Berg

Email Address: jennifer.berg@ngem.com

Affiliation: Local Government Sustainable Energy

Subject: Comments of LGSEC

Comment:

Please see attached comments submitted on behalf of the Local  
Government Sustainable Energy Coalition.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/81-  
lgsec\\_2011\\_06\\_22\\_comments\\_to\\_carb\\_re\\_revenue\\_allocation\\_final.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/81-lgsec_2011_06_22_comments_to_carb_re_revenue_allocation_final.pdf)

Original File Name: LGSEC\_2011\_06\_22 comments to CARB re Revenue Allocation  
FINAL.pdf

Date and Time Comment Was Submitted: 2012-06-22 09:01:34

No Duplicates.



## **Comment 74 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Karen  
Last Name: Christensen  
Email Address: kchristensen@rcdsantacruz.org  
Affiliation: RCD of Santa Cruz County

Subject: AB 32 Cap and Trade Program Auction Proceeds Investment Plan  
Comment:

June 21, 2012

Mary D. Nichols, Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: AB 32 Cap and Trade Program Auction Proceeds Investment Plan

Dear Chair Nichols and members of the California Air Resources Board:

Thank you for hosting the public consultation on the investment of AB 32 cap and trade auction proceeds on May 24, 2012. Water related energy use in California consumes 19 percent of the state's electricity, 30 percent of its natural gas, and 88 billion gallons of diesel fuel every year. It is logical to conclude that cap and trade auction revenues should flow to address this single largest consumer in the state. On behalf of the Santa Cruz Integrated Regional Water Management partner agencies, who include: the Cities of Watsonville and Santa Cruz; Central, Scotts Valley and Soquel Creek Water Districts; the County of Santa Cruz; and the Resource Conservation District of Santa Cruz County, we offer these ideas for how to address the two questions posed by the Board:

(1) How can California effectively invest the auction revenues to advance the goals of AB32 including long-term, transformative efforts to improve public health and develop a clean energy economy?

a) In terms of water management there are many places that the state can invest to achieve transformative change:

- Agricultural and urban water use efficiency programs
- Infrastructure to reduce energy and water use for water and wastewater management. For example, energy efficient pumps, membranes and systems.
- Low Impact Development (LID) techniques can be used to mitigate future flooding, benefit water quality, provide urban greening and provide relief from heat island effects. The state should continue to provide grants and technical support for LID at the local level.

- The portfolio approach to Integrated Regional Water Management (IRWM) has been very successful. The scope of IRWM can be expanded to bring energy utilities and transportation managers into the conversation so that water, energy, and transportation/land use are considered within the same collaborative, stakeholder driven approach that includes a focus on GHG reductions. Cap and trade auction revenues can be made available to efforts to support regional priorities utilizing the IRWM process or a similar process.

b) Engage the California State Coastal Conservancy and other state conservancies in identifying and funding open space, wetlands and forest acquisitions and restoration projects with a climate benefit. These projects could become part of a statewide climate change adaptation or mitigation strategy. The State Conservancies should participate more fully in the Integrated Regional Water Management Program in order to identify and also promote environmental projects with a climate benefit. An example of this is the acquisition and restoration of coastal wetlands to provide a buffer against sea level rise, sequestration of carbon and a bank of biodiversity and habitat.

c) Through the Department of Conservation, make funding available to Resource Conservation Districts, counties and others to a) accelerate adoption of sustainable agricultural practices, and b) facilitate economic valuation of ecosystem services. It is important to have a clear understanding of the economic value that functioning ecosystems contribute in order to assess impacts attributable to climate change, and to engage stakeholders in finding real solutions. For example, if agri-businesses do not value the economic benefit provided to them by natural pollinators, how can they be expected to engage in efforts to protect pollinators' habitat in the face of climate change? Transformative should mean moving to a system that is sustainable. Recognizing payments for ecosystem services is one way to achieve this.

d) Empower local leadership by providing funding for local pilot programs that can be replicated. For example, the City of Watsonville and the Resource Conservation District of Santa Cruz County are collaborating on development of a program to identify local carbon offsets with multiple benefits (environment, jobs, public health, economy) for the voluntary carbon market. More seed funding and operating support is needed to implement innovative efforts like these at the local level. Buyers of credits have an interest in investing in the local economy; therefore, local agencies need to identify local carbon offset projects that are cost-effective and multi-benefit.

(2) What criteria should be prioritized in the plan for investment of auction funds and why?

a) Coastal areas and the Bay-Delta should be a priority for investment because these will be most directly affected by sea level rise, storms and flooding. Coastal resources and infrastructure threatened by climate change include: transportation systems, agriculture, water and wastewater treatment, outfalls and pipelines, aquifers, electric utilities, fisheries and wetlands and many other human needs such as homes, schools and businesses. The state should make funds available through Integrated Regional Water Management for regions to prioritize addressing these vulnerabilities.

b) Projects that demonstrate a collaborative approach of agencies, businesses, and stakeholders working together should be a priority.

c) Project proponents showing early actions and/or a history of past performance should be priority.

d) The water sector should be priority due to the potential to achieve multiple benefits with a single investment.

The Santa Cruz IRWM Steering Committee thanks you for this opportunity to provide comments on behalf of the Santa Cruz IRWM partner agencies. If you would like more information please contact Karen Christensen at (831) 464-2950 or [kchristensen@rcdsantacruz.org](mailto:kchristensen@rcdsantacruz.org).

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/82-santa\\_cruz\\_ab32\\_cap\\_and\\_trade\\_comments.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/82-santa_cruz_ab32_cap_and_trade_comments.pdf)

Original File Name: Santa Cruz AB32 Cap and Trade Comments.pdf

Date and Time Comment Was Submitted: 2012-06-22 08:55:50

No Duplicates.

**Comment 75 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: CJ

Last Name: Kawamoto

Email Address: cjkawamoto@yahoo.com

Affiliation:

Subject: NO to Cap and Trade: Bad for California

Comment:

Every industry uses energy. Every industry in CA would have an increase in costs if you adopt Cap and Trade. Making goods in CA would become MORE expensive. CA industry would diminish, shrink, as industry moves elsewhere. Lesser-skilled labor would find fewer opportunities. Costs for CA goods would increase, become less competitive. More foreign and out-of-state goods would be imported for sale to Californians. How is this good for CA industry, lesser-skilled workers, CA unemployment situation, or residents who need goods for daily survival? Seems highly damaging to in-state residents for possible incremental betterment of a transient media (air). I could more support national or international air emission standards. This proposed action is wrong - so detrimental to economy. Why would CARB brandish another weapon opposing California's economic recovery?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 09:19:02

No Duplicates.

## **Comment 76 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Andreas

Last Name: Klugescheid

Email Address: andreas.klugescheid@bmwna.com

Affiliation: BMW Group

Subject: Comments BMW Group ref. Public Consultation on Investment of Cap-and-Trade Auction Proceed

Comment:

BMW Group supports investing cap-and-trade revenues in clean energy solutions necessary to achieve California's long-term environmental, public health, and economic goals. Noting the critical role efficient vehicle technologies will play in reducing emissions in the transportation sector, Executive Order B-16-2012 set a benchmark of 1.5 million zero emission vehicles in California by 2025. Unfortunately, tools like the AB118 funding for consumer incentives necessary to accelerate the still nascent clean vehicle market will expire just when they are needed most. Revenue from California's cap-and-trade program, much of which will come from the transportation sector, could meet this need and ensure the goals established by executive order and required by AB 32 are met, keeping California at the forefront of the nation's efforts to secure a clean energy future.

Vehicle technologies that can significantly reduce CO2 emissions are already available. For example, driving a modern plug-in electric vehicle on California's relatively clean electricity mix today emits only a quarter as much as the average conventional vehicle. Those gains will only increase as California continues to improve the environmental performance of its electricity generation, as required by the Renewable Portfolio Standard.

Consumer incentives play a critical role in accelerating adoption of such next-generation clean technologies. Unfortunately, funding sources for many clean vehicle incentive programs are set to expire just when they are needed most. Revenue from California's cap-and-trade program should be used to meet this need, and to accelerate consumer investment in vehicles that will play a central role in meeting the goals established by Executive Order B-16-2012 and the targets required by AB 32. Californians have led the nation in creating an early market for clean vehicles, purchasing the lion's share of the first widely available plug-in cars, but success is far from guaranteed. Continuity of incentive funding will be critical to ensure the market expands sufficiently to reduce the state's dependence on fossil fuels, meet long-term environmental goals, and secure California's leadership in the clean energy economy.

BMW Group will be pleased to provide input to ARB developing appropriate plans in order to achieve the above mentioned goals.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/84-bmw\\_group\\_commentsinvestmentcatauctionproceeds.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/84-bmw_group_commentsinvestmentcatauctionproceeds.pdf)

Original File Name: BMW\_Group\_CommentsInvestmentCaTAuctionProceeds.pdf

Date and Time Comment Was Submitted: 2012-06-22 09:31:48

No Duplicates.

## **Comment 77 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Don

Last Name: Stout

Email Address: dstout@patlawyers.com

Affiliation:

Subject: Opposition to CARB Cap and Trade Plan

Comment:

The purpose of this comment is to register my opposition to the CARB cap and trade plan currently under consideration. Our state is already one of the least competitive places to do business, and as an intellectual property attorney I see daily the struggles my clients face dealing with extremely high energy costs, uncompetitive taxes, and an extremely difficult regulatory environment. With energy costs already at least 50% higher than those of other states, including neighboring states, it is difficult to see how anyone can think that layering on billions of dollars in additional cap and trade costs will help. The best middle class jobs are manufacturing jobs, and we are killing our manufacturing sector with our toxic business environment.

I understand that CARB's cap and trade auction will be managed by international financial firms like Deutsche Bank and Market North America and will be open to Wall Street traders and speculators who will profit at the expense of hard-working taxpaying Californians. What will prevent the kind of market manipulation that led to the recent energy and mortgage crises? This is just another example of government intervening to help friends and hurt everyone else. The auction is a tax on California businesses that their competitors in other states will not have to pay. This will hurt the economy, and lead to even more businesses fleeing California for other states, taking jobs and tax revenues with them.

This hidden energy tax is unnecessary because the carbon reductions required under AB 32 can be achieved without a cap and trade auction. The auction is just another way to raise money for CARB to spend on programs and subsidies (like the federal government's Solyndra disaster for example) with no accountability as to their cost-effectiveness or environmental benefit.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 09:28:02

No Duplicates.

**Comment 78 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Saudra

Last Name: Fuller

Email Address: saudra@msn.com

Affiliation:

Subject: CARB

Comment:

Please stop the cap and trade auction, it is a hidden energy tax that will "break" us. Why are you taxing California businesses to the point where they cannot compete with businesses outside California. I believe that the carbon reductions that are required under AB32 can be achieved without a cap and trade auction.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 09:38:51

No Duplicates.



**Comment 79 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Karl  
Last Name: Baysinger  
Email Address: Cargoclutch9@gmail.com  
Affiliation:

Subject: Cap and Trade  
Comment:

It never ceases to amaze that in a state with one of the highest unemployment rates would continue to see its bureaucrats drive off businesses with legislation that stymies economic growth! Unbelievable!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 09:53:49

No Duplicates.

**Comment 80 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: Auction Proceed Public Consultation Comments

Comment:

Attached for your review and consideration please find comments from the AB 32 Implementation Group regarding the May 24th 'Auction Proceeds Public Consultation.'

If you have any questions or need anything further, please feel free to contact Shelly Sullivan at 916 858-8686.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/88-igcommentsformay24panel-auction\\_revenue\\_final\\_6\\_22\\_2012.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/88-igcommentsformay24panel-auction_revenue_final_6_22_2012.pdf)

Original File Name: IGCommentsforMay24panel-Auction Revenue FINAL\_6\_22\_2012.pdf

Date and Time Comment Was Submitted: 2012-06-22 09:57:44

No Duplicates.

**Comment 81 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Jamie

Last Name: Hall

Email Address: [jhall@calstart.org](mailto:jhall@calstart.org)

Affiliation:

Subject: Use of Cap and Trade Auction Revenues

Comment:

CALSTART's comments on the use of auction revenues from California's AB 32 cap and trade program are attached.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/89-calstart\\_input\\_on\\_use\\_of\\_ab\\_32\\_auction\\_revenue.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/89-calstart_input_on_use_of_ab_32_auction_revenue.pdf)

Original File Name: CALSTART input on use of AB 32 auction revenue.pdf

Date and Time Comment Was Submitted: 2012-06-22 09:37:11

No Duplicates.

## **Comment 82 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Newton

Last Name: Russell

Email Address: senatornr@aol.com

Affiliation: conservative and Republican

Subject: Cap and Trade

Comment:

Ms. Nichols, there is no question that you are a dedicated public servant and are doing what you think is best, but I have to tell you that you are wrong. You were wrong when I was still in the Senate years ago and you are still wrong going down the line of bigger govt., telling us what we may or may not do. Your program, and your high handed actions in the recent public hearings are examples of your know it all attitude. I know that you think that you are right, but you are not. This will cost millions of dollars to business and tax payers, and moves government farther into the lives and businesses of our citizens. You know all the arguments against this proposal so I will no reiterate them here. It is a job killer for every dollar one must spend for all the govt. programs is another dollar that won't be used to hire workers and to expand one's business. I pray that God will open your eyes to the right way to help our economy and our business and workers. In my opinion and that of many others, Cap and Trade is not the right way.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 09:59:50

No Duplicates.

**Comment 83 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Marvin

Last Name: Reed

Email Address: reed.marvin@gmail.com

Affiliation: Citizen

Subject: Cap 'N Trade is a hidden energy tax. It's not needed.

Comment:

Your Cap 'N Trade is a hidden energy tax. It's not needed because carbon reductions required under AB 32 can be accomplished without a cap and trade auction. The auction is just another way of making money for CARB to spend on programs and subsidies (like the federal government's Solyndra disaster for example) with no accountability as to their cost-effectiveness or environmental benefit.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 09:35:03

No Duplicates.

**Comment 84 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Williams

Email Address: nwilliams81@surewest.net

Affiliation:

Subject: CAP and Trade auction proceeds investment

Comment:

I strongly oppose this measure. It will cost more jobs and downturn  
the economy even further!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 10:12:44

No Duplicates.

**Comment 85 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Christy

Last Name: Lonquist

Email Address: clonquist@hotmail.com

Affiliation:

Subject: California "Cap and Trade" Scheme

Comment:

I am writing to ask the CARB board to abandon the sale of carbon credits. This scheme enriches speculators and politicians while putting a huge burden on taxpayers, ratepayers, and businesses. We need a break. You are intent on killing our jobs and emptying our pockets. There are better ways to achieve common sense goals. We need some balance to preserve our environment and our economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 10:51:03

No Duplicates.

## **Comment 86 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Pam  
Last Name: Hart  
Email Address: pamula1@hotmail.com  
Affiliation: none

Subject: Cap and Trade - Energy Taxes  
Comment:

The legislation is a tax on California businesses that their competitors in other states will not have to pay. This will hurt the economy, and lead to even more businesses fleeing California for other states, taking jobs and tax revenues with them.

I am familiar with what happened when this started - and 10-wheeler trucks had to get 'upgraded' to the new standards - many one-truck operators could not afford new equipment and have now gone out of business. Even the cement companies that were forced to get new equipment - even with tax credits and incentives - spent so much money that they are now reeling from the expenditures coupled with the downed construction industry to the point of bankruptcy.

Additional taxes should not be 'hidden' in this type of legislation - and especially on small businesses that are just trying to survive the multitude of other 'hidden' taxes and regulatory fees associated with doing business in California.

Taxes should be voted on in the legislature with a two-thirds vote and not hidden in regulations such as this.

Please stop this faulty fee now - perhaps put it on hold for another 5 years to see how the State and the Nation come out of this recession. We don't need it as there are other laws on the books that will take care of carbon reduction.

Cap and Trade Auction fees are just another 'junk' bond scheme and should not be forced onto the public as legitimate. Where does the money go? Who gets rich from this? Certainly not the businesses and citizens of the State of California. What authority gives this board the power to do this? These are not elected officials.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 11:23:11

No Duplicates.





**Comment 87 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Jim  
Last Name: Walker  
Email Address: Jim.Walker@yahoo.com  
Affiliation:

Subject: AB 32  
Comment:

CARB is nothing more than an attempt at (legal, though I doubt it) racketeering. CARB should be shut down and disbanded, just as DOIT was!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 11:38:58

No Duplicates.

**Comment 88 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Brian  
Last Name: Biering  
Email Address: [bsb@eslawfirm.com](mailto:bsb@eslawfirm.com)  
Affiliation: Ellison, Schneider & Harris LLP

Subject: Comments of Wildflower Energy LP  
Comment:

Wildflower Energy, LP ("Wildflower") provides these comments on the investment of cap-and-trade auction proceeds and in response to the May 24, 2012 public consultation meeting. Wildflower encourages CARB to utilize a small portion of the auction proceeds to address pre-AB 32 long-term power sales contracts that do not include provisions allowing the project to recover the new greenhouse gas ("GHG") compliance costs within the contract structure and also have no near-term access to markets in which the GHG compliance costs might be recovered ("Pre-AB 32 Projects"). Wildflower owns Pre-AB 32 Projects, which entered into long-term contracts to stabilize the California electric market in 2001 and 2004. These Pre-AB 32 Projects may suffer a potentially devastating penalty for their commitment to long-term contracts and stable pricing. While the "Pre-AB 32 Contract" issue is recognized by both the CPUC and CARB, the issue remains unresolved. As discussed below, a small set-aside of allowance revenue to address this issue would further the purposes of AB 32 by ensuring equity and minimizing the costs of the program.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/96-120622\\_wfe\\_letter\\_to\\_arb\\_re\\_cap-and-trade\\_revenue\\_\\_00075522\\_.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/96-120622_wfe_letter_to_arb_re_cap-and-trade_revenue__00075522_.pdf)

Original File Name: 120622 WFE Letter to ARB re cap-and-trade revenue (00075522).PDF

Date and Time Comment Was Submitted: 2012-06-22 11:37:31

No Duplicates.

**Comment 89 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Bill

Last Name: Sommers

Email Address: bill44@wavecable.com

Affiliation:

Subject: Cap and Trade

Comment:

I am opposed to any regulations you people make. All you are doing is stiffling business. Climate change is not man made , and nothing you do will change. You are just a waste of money. You are a Marxist entity. I am agaist cap and trade. Its nothing more than a scam to justify your existance

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 11:40:50

No Duplicates.

**Comment 90 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Edward  
Last Name: veek  
Email Address: ed@debed.net  
Affiliation:

Subject: End Cap & trade  
Comment:

Cap & trade is part of the "Communist Agenda 21" to establish a one world Socialist government.  
Their aim is to bankrupt America. Cap and trade must be abolished.  
CO2 is required for vegetation to grow.  
Animals (humans for you idiots) adapted before & will again.  
Global cooling, warming, cooling, and warming again are Natural,  
HUMANS ARE NOT THE CAUSE.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 11:43:29

No Duplicates.

## **Comment 91 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Patrick  
Last Name: Harris  
Email Address: cdw7503@hotmail.com  
Affiliation:

Subject: Input on Cap and trade  
Comment:

I am completely against the Cap and Trade Auction. The auction is a tax on California businesses that their competitors in other states will not have to pay. This will hurt the California economy, and lead to even more businesses fleeing California for other states, taking jobs and tax revenues with them.

It is obvious that your goal is to bankrupt Californians; otherwise your actions make no other sense at all.

Global Warming, Climate change or whatever you want to call it now is a total fraud. The sun warms the earth and has more more influence than any other factor in temperature changes. Shame on you for taking advantage of ignorant fellow Californians to push this auction and the global warming fraud.

Sincerely,  
-Patrick and Antonette Harris  
Sacramento, California 95822

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 12:05:25

No Duplicates.

**Comment 92 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: George

Last Name: Clatterbuck

Email Address: vaca828@sbcglobal.net

Affiliation:

Subject: Cap-and-Trade Auction Proceeds

Comment:

The cap and trade auction is a hidden energy tax that will cost California businesses and consumers billions of dollars in higher energy costs and higher prices for food and other essential goods and services.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 12:42:58

No Duplicates.

## **Comment 93 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Coyne

Email Address: betsy\_coyne@yahoo.com

Affiliation:

Subject: Cap and Trade auction

Comment:

I object to the cap and trade program and the upcoming auction. This auction involves foreign investment entities and will expose the proceeds to market manipulation. This represents an enormous new tax on California businesses, not authorized by the legislature as required by law, which will only make California an even worse place to do business than it already is. This is saying a lot, since California has been rated the worst place to do business for the last eight years. Our energy costs are already the highest in the nation. With the inevitable skyrocketing energy rates this will cause, more and more businesses will close or move to other states. How can this be good for California? Time and again your agency acts with wholesale disregard for the costs of your actions. People who have to work and live in the real world are constantly penalized by your zealous focus on the fraud that is man made global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 12:37:18

No Duplicates.



**Comment 94 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Terry

Last Name: Preston

Email Address: tpreston@walksacramento.org

Affiliation: WALKSacramento

Subject: Cap and Trade Auction Comments

Comment:

Please read the attached comments.

Terry Preston. WALKSacramento

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/102-cap\\_and\\_trade\\_auction\\_proceeds\\_-\\_walksacramento\\_6-22-12.doc](http://www.arb.ca.gov/lists/investmentplan-ws/102-cap_and_trade_auction_proceeds_-_walksacramento_6-22-12.doc)

Original File Name: Cap and Trade Auction Proceeds - WALKSacramento 6-22-12.doc

Date and Time Comment Was Submitted: 2012-06-22 12:43:50

No Duplicates.

## **Comment 95 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: David  
Last Name: Yaksick  
Email Address: dyaksick@gmail.com  
Affiliation:

Subject: Radical Environmentalism  
Comment:

CARB,

California has prided itself on being ahead of the Feds on the subject of environmental laws and regulation. The economic damage to California by this mission is severe and undeniable (fallow farm land, businesses leaving the state, extreme debt, budgets balanced with smoke and mirrors). But the facts have no impact on your policies. You are committed to save California citizens from themselves and nothing is going to stand in your way. Since your minders in the legislature are similarly dedicated to the the mission there seems little hope that California will survive this foolish behavior. One can only pray that when California is bankrupted and economically beyond recovery the Federal government will take notice.

Dave Yaksick

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 12:32:35

No Duplicates.

**Comment 96 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Autumn  
Last Name: Bernstein  
Email Address: autumn@climateplanca.org  
Affiliation:

Subject: Coalition letter on SB 375 and cap and trade revenue  
Comment:

Please find the attached letter.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/104-coalition\\_letter\\_on\\_c\\_t\\_allocation\\_and\\_sb\\_375\\_june\\_2012.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/104-coalition_letter_on_c_t_allocation_and_sb_375_june_2012.pdf)

Original File Name: Coalition letter on C+T allocation and SB 375 June 2012.pdf

Date and Time Comment Was Submitted: 2012-06-22 12:47:56

No Duplicates.

**Comment 97 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Claire

Last Name: Chanel

Email Address: clairety33@wavecable.com

Affiliation:

Subject: cap and trade

Comment:

This is one of the worst ideas for the state of California!! We don't need more regulations and more "taxes".

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 12:47:55

No Duplicates.

## **Comment 98 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Kristi

Last Name: Birney

Email Address: KBirney@EnvironmentalDefenseCenter.org

Affiliation: Environmental Defense Center

Subject: Use of Cap-and-Trade Auction Funds to Reduce GHG Emissions from Ships

Comment:

Dear Ms. Nichols and Board Members:

The Environmental Defense Center (EDC) is pleased to provide input on the use of Cap-and-Trade auction proceeds to reduce greenhouse gases (GHG) contributing to climate change. We support the request of the Santa Barbara County Air Pollution Control District (SBCAPCD) and Channel Islands National Marine Sanctuary (CINMS) to use some of the funds to develop an incentive program that will reduce the speeds of large marine ships traveling along the California coast.

An incentive based program using Cap-and-Trade funds to reward large marine ships for reducing ship speeds from 18-22 knots/hour (current speed) to 12 knots/hour along the California coast would reduce carbon emissions and fulfill the goals of Assembly Bill 32 (AB 32). Specifically, incentivizing vessels greater than 300 gross registered tons to travel at speeds 12 knots/hour or slower would reduce GHG emission, protect whales from collisions with vessel and noise pollution, and provide other benefits associated with reduced speed. Benefits from an incentive based program are bulleted and details for each benefit are provided in the attached pdf.

1. Significantly Reducing GHG Emissions from Ships
2. Providing Additional Air Quality Public Health Benefits
3. Supporting the State's Economy and Efforts to Develop a Clean-Energy Economy
4. Reducing the Lethality and Severity of Whale Strikes and Acoustic Noise Impacts
5. Building on the Successful Existing LA Long Beach Green Ports Program
6. Reducing Fuel Cost for the Industry
7. Reductions are Measurable and Verifiable

The Cap-and-Trade auction fund provides a unique opportunity to develop an incentive based program. It is important to recognize that this is a rare instance in which the Air Resources Board can address multiple environmental concerns and fulfill multiple objectives in AB 32 through a single mechanism

Thank you for your consideration of these comments. Please do not hesitate to contact me or Linda Krop, EDC Chief Counsel; at (805) 963-1622 should you have further questions or concerns.

Sincerely,

Kristi Birney  
Marine Conservation Analyst  
Environmental Defense Center

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/106-final\\_edc\\_letter\\_re\\_carb\\_cap\\_and\\_trade\\_6-22.12.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/106-final_edc_letter_re_carb_cap_and_trade_6-22.12.pdf)

Original File Name: Final EDC letter re CARB cap and trade 6-22.12.pdf

Date and Time Comment Was Submitted: 2012-06-22 12:44:58

No Duplicates.

**Comment 99 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Claudia  
Last Name: Taylor  
Email Address: cctayloravacad@aol.com  
Affiliation: Fed Up California Citizen

Subject: CARB is Murdering California's Economy!

Comment:

You've got to be kidding? The Cap and Trade carbon credit scheme will put the bullet through the hearts of California businesses! They will die before they even have a chance to run to another state! You can only force so much out of the businesses that already exist to totally squelch their ability to compete . . . and, the worst thing about all of this (besides the FACT that it won't help the environment one single iota) is it's you and me . . . the people who buy the goods and services . . . who will actually be paying for all of this in higher prices!! Really, now, higher prices in an economy where 12+ percent (OR PERHAPS EVEN MORE) of Californians are unemployed? This scheme is absolute insanity!! No, No, No to CARB's scheme to sell carbon credits!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 12:59:00

No Duplicates.

**Comment 100 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Scott  
Last Name: Sims  
Email Address: scottzen@att.net  
Affiliation:

Subject: CAP and Trade  
Comment:

Dear Public Servants:

I am in total opposition to the cap and trade policies that you are proposing. I find these ideas deplorable. face it, this state is in a financial mess and this will only make matters worse. The state is losing jobs and professional people by the thousand sand this will make it worse.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 13:08:19

No Duplicates.



**Comment 101 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: robert

Last Name: leat

Email Address: rleat@sbcglobal.net

Affiliation: capital city mopars

Subject: cap and trade energy tax

Comment:

Please stop this now.

It is again, another unnecessary tax and should not be allowed to go forward.

It is very hard to understand how an unelected and unaccountable agency can impose this tax and additional auction and management costs on all citizens in California

WITHOUT AN ELECTION AND WIDE OPEN PUBLIC HEARINGS

We have lost enough jobs and employers to these uninformed public servants who continue to pass bad legislation and make flawed recommendations.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 13:15:55

No Duplicates.

## **Comment 102 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Dominic

Last Name: Gaffney

Email Address: dominicgaffney@gmail.com

Affiliation:

Subject: Public Input on Investment of Cap-and-Trade Auction Proceeds

Comment:

California's landmark Cap & Trade system is one of the best-designed carbon markets in the world, and it will be instrumental in helping California meet its greenhouse gas reduction targets for 2020 and 2050.

Its benefits go beyond simply meeting the reductions fixed by the system's cap. The revenue from allowance auctioning also offers a unique and reliable source of funding for deeper greenhouse gas mitigation in the state. The revenue can also be put towards accomplishing many of the supplementary goals of the state's AB 32 Scoping plan, such as health, employment, and environmental justice benefits. Obviously the cost-effectiveness of the greenhouse gas abatement remains a top priority— however, these additional benefits of meeting the goals of AB 32 should not be undervalued.

Because of the seemingly infinite number of mitigation opportunities in the state, a definitive solution for the effective investment of auction funds will be hard to come by. Therefore, having a way of comparing potential investments based on their overall benefits is fundamental for developing a suitable investment plan.

Farbes and Kammen's (2010) report for Next 10 provides a suitable example. It outlines possible methods of quantifying the different benefits of proposed investment options. They came up with five categories: health benefits, green job creation, social/community benefits, ecological benefits, and market barrier reduction.

Quantifying these benefits would allow the Air Resources Board to perform a simple cost-benefit analysis, providing a useful means of comparison between potential revenue investment plans. Each supplementary benefit could be assigned a weighting based on the priorities of the ARB. Projects providing the greatest emissions reduction and supplementary benefits at the lowest cost would receive funding. This would create competition to maximize total benefits and ensure that cap and trade revenues are invested fairly.

Auction revenues are projected to be \$5.8 billion in 2015, increasing steadily thereafter. If they are invested effectively they could make a significant impact on the success of California's Global Warming Solutions Act. However, this rides on having a proper framework to compare the multiple benefits of potential investments— until then, California runs the risk of seeing this valuable resource go up in smoke.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 13:47:10

No Duplicates.

**Comment 103 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: John

Last Name: Quilter

Email Address: jqulter@peoplepc.com

Affiliation:

Subject: Cap & Trade CO2 regulations

Comment:

This is a bad idea which will drive up costs of thousands of services and products in the state of California. With California's precarious financial condition and very high cost of living, why be the only state to take this costly issue on when it has been rejected by other states and the federal government.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 14:30:50

No Duplicates.

**Comment 104 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Richard A.

Last Name: Stedman

Email Address: rstedman@mbuapcd.org

Affiliation: Monterey Bay Unified APCD

Subject: Recommendations on Investment Plan for Cap-and-Trade Program

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/112-mbuapcd\\_cap-and-trade\\_investment\\_plan\\_recommendations.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/112-mbuapcd_cap-and-trade_investment_plan_recommendations.pdf)

Original File Name: MBUAPCD\_Cap-and-Trade Investment Plan Recommendations.pdf

Date and Time Comment Was Submitted: 2012-06-22 14:33:31

No Duplicates.

**Comment 105 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Audrey

Last Name: Chang

Email Address: [info@efficiencycouncil.org](mailto:info@efficiencycouncil.org)

Affiliation: California Energy Efficiency Industry Co

Subject: California Energy Efficiency Industry Council on AB 32 Auction Revenue

Comment:

The Efficiency Council urges California to direct significant investments of cap-and-trade auction proceeds into energy efficiency as efficiency will result in long-term and transformative benefits to California's public health and clean energy economy. An energy efficiency investment strategy for the use of GHG auction revenues is a jobs plan, a strategy that every California home and business can participate in, and an economic revitalization plan; as well as simply smart economics. Such efficiency investments will shift California's energy investments to investing in local economies and creating jobs - which can never be outsourced - to upgrade homes, offices and factories in the state. This shift also creates a virtuous cycle by lowering energy bills for businesses and consumers, freeing up even more money that can be invested in the local economy.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/113-carb\\_efficiency\\_council\\_letter\\_re\\_ct\\_investments\\_06-22-12.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/113-carb_efficiency_council_letter_re_ct_investments_06-22-12.pdf)

Original File Name: CARB Efficiency Council Letter Re CT Investments\_06-22-12.pdf

Date and Time Comment Was Submitted: 2012-06-22 14:34:35

No Duplicates.

**Comment 106 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Nancy J.

Last Name: Hughes

Email Address: mfarr@arb.ca.gov

Affiliation:

Subject: AB 32 Investments In Sustainability

Comment:

See Attached...

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/114-infillbuilders\\_urbanforests\\_releaf\\_labsol.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/114-infillbuilders_urbanforests_releaf_labsol.pdf)

Original File Name: infillbuilders\_urbanforests\_releaf\_LabSol.pdf

Date and Time Comment Was Submitted: 2012-06-22 14:36:38

No Duplicates.

## **Comment 107 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Lane  
Email Address: michael@nonprofithousing.org  
Affiliation:

Subject: Expenditure plan for cap and trade auction revenues  
Comment:

Dear Chair Nichols:

On behalf of the Non-Profit Housing Association of Northern California (NPH), I write to urge you to include transit-oriented affordable housing as an eligible category and key component of the expenditure plan for cap and trade auction revenues under AB 32.

NPH is the collective voice of those who support, build, and finance affordable housing. We promote the proven methods of the non-profit sector and focus government policy on housing solutions for lower income people who suffer disproportionately from the housing crisis.

Investment in the sustainable development and preservation of affordable housing will help the state meet its greenhouse gas reduction goals while also benefiting disadvantaged communities. When affordable homes are located near transit stations, low-income residents are more likely to use alternative transportation, reducing their reliance on car commuting. Providing energy efficient affordable housing, in the form of both newly constructed and retrofitted homes and locating them near transit stations will help to reduce our state's carbon emissions. Cap and trade funds should also be utilized to retrofit older affordable housing properties in order to incorporate new green building and energy efficiency features.

It is our position that an affordable housing component as outlined above must be a central part of any greenhouse gas reduction strategy funded by cap and trade auction proceeds.

We thank you for the opportunity to provide this input.

Michael Lane  
Policy Director  
Non-Profit Housing Association of Northern California (NPH)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 14:39:35



No Duplicates.

**Comment 108 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Karen

Last Name: Muir

Email Address: kcheeto@juno.com

Affiliation:

Subject: CARB

Comment:

I am praying that you do not continue with the cap and trade auction. I see nothing but heartache due to higher taxes and more jobs lost because of this. California has enough problems without adding to them with hidden energy taxes that will cost entirely too much for everyone; business and consumers alike. We have too many businesses leaving California as it is, and we don't need to be adding to this. I might also add that the legality of imposing these new taxes is questionable at best.

Please, no cap and trade for California!!!

Karen Muir

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 15:03:07

No Duplicates.

**Comment 109 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: bonnie.holmes-gen@lung.org

Affiliation: American Lung Association in California

Subject: Cap and Trade Allocation

Comment:

I am attaching our ALA in California comments on cap and trade allocation.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/117-lung\\_association\\_comments\\_re\\_ab\\_32\\_investment\\_6.21.12.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/117-lung_association_comments_re_ab_32_investment_6.21.12.pdf)

Original File Name: Lung Association comments re AB 32 Investment\_6.21.12.pdf

Date and Time Comment Was Submitted: 2012-06-22 15:11:16

No Duplicates.

**Comment 110 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Sean  
Last Name: Lane  
Email Address: slane@olympuspower.com  
Affiliation: Olympus Power, LLC

Subject: PEB Comment Letter to CARB Regarding Use of Allowance Auction Revenue  
Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/118-peb\\_cmt.\\_ltr.\\_to\\_carb\\_re\\_use\\_of\\_allow\\_auction\\_revenue--olympus\\_power\\_\\_6.22.12\\_.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/118-peb_cmt._ltr._to_carb_re_use_of_allow_auction_revenue--olympus_power__6.22.12_.pdf)

Original File Name: PEB Cmt. Ltr. to CARB re Use of Allow Auction Revenue--Olympus Power (6.22.12).pdf

Date and Time Comment Was Submitted: 2012-06-22 15:10:09

No Duplicates.

**Comment 111 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Barbara  
Last Name: Eastman  
Email Address: geast37384@aol.com  
Affiliation:

Subject: No ! to new energy taxes by the CARB board  
Comment:

I find it outrageous that the CARB board is attempting to impose new energy taxes that their own Economic and Allocation Advisory Committee estimates could cost California \$143 billion dollars. California is already in a terrible economic shape, this will cause even more businesses to leave our state and with them we'll lose more jobs and revenues. Over a million jobs could be lost. Get rid of this board. Their ideas are not good for our state.

Barbara Eastman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 15:10:00

No Duplicates.

**Comment 112 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Gregory

Last Name: Helms

Email Address: ghelms@oceanconservancy.org

Affiliation: Ocean Conservancy

Subject: Comment letter: Use of Cap-and-Trade Auction Funds to Reduce GHG Emissions  
from Ships

Comment:

please see attached comment letter

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/120-oc\\_ltr\\_carb\\_ship\\_speed\\_062212.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/120-oc_ltr_carb_ship_speed_062212.pdf)

Original File Name: OC Ltr CARB ship speed 062212.pdf

Date and Time Comment Was Submitted: 2012-06-22 15:27:03

No Duplicates.

**Comment 113 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Alan  
Last Name: Kellogg  
Email Address: alankellogg@cox.net  
Affiliation:

Subject: Cap and Trade  
Comment:

I strongly oppose any implementation of any cap and trade scheme in our state. I feel such a scheme will only benefit financial institutions and not the California business person and taxpayer.

As a citizen of this state I also would also like to say I am highly dismayed at the recent cap and trade hearing chaired by Mary Nichols. This hearing was a sham and a disgrace to the California Air Resources Board and Ms. Nichols should be replaced with someone more amenable to hearing the opinion of the people of this state. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 15:35:50

No Duplicates.

## **Comment 114 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Brown

Email Address: tbrown3905@comcast.net

Affiliation:

Subject: Against CARB

Comment:

Dear Committee Members,

I in this present climate of financial strain and uncertainty, with high unemployment rates, I can hardly believe you are pressing ahead with this scheme! Of course, all Californians want a better environment in many ways, and our progress over the past 30 years has been exceptional. However, this is the wrong time and wrong way to go about improving our environment.

Your timing could not be worse. Many Californians are out of work or underemployed. With the increased costs this will entail, job creation will necessarily suffer. The middle class who pays the largest amount of private utility bills will also suffer. I think a better step now is to continue with conservation measures. You can start with your own offices and computers--and turn them all off at night. All other public offices can follow suit. The lights can be gradually changed over to LED's which consume less energy and are better for the environment than CFL's.

The way you are going about this is counterproductive for our state. California dollars will be flowing out of the state to banks or brokers on the east coast and in Europe. There will be no financial benefit to our state or citizens. The director of your bureaucracy shut off public comments recently at a public meeting she had called for that purpose. The message is: WE DO NOT WANT CAP AND TRADE in California. Please reverse this policy immediately (or at least postpone it "indefinitely" to save face). You cannot dictate to California taxpayers and citizens!

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 15:40:46

No Duplicates.



## **Comment 115 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Sean  
Last Name: Hastings  
Email Address: sean.hastings@noaa.gov  
Affiliation: NOAA

Subject: Use of Cap-and-Trade Auction Funds to Incentivize Ships to Reduce Speed  
Comment:

Dear Chair Nichols and Board Members,

We understand that the State of California's Air Resources Board (CARB) will be developing an investment plan for the auction proceeds from the cap-and-trade program to meet the goals of Assembly Bill 32 to improve public health, develop a clean energy economy and provide additional environmental and public health benefits. The National Oceanic and Atmospheric Administration's (NOAA) Office of National Marine Sanctuaries, West Coast Region and National Marine Fisheries Service, Southwest Region support the use of these proceeds to create an incentive program that rewards large ocean-going ships for slowing down while transiting off California's coast. We believe this use of the funds could achieve multiple environmental benefits important to both of our agencies.

Research has shown that large ocean-going vessels traveling at slow speeds substantially reduce their greenhouse gas emissions and nitrogen oxide and sulfur dioxide pollution. Encouraging ships to travel at slower than normal speeds can also reduce the anthropogenic effects on marine mammals by reducing the risk of lethal strikes and noise pollution in the marine environment. Identifying and minimizing impacts to endangered blue, fin and humpback whales is a priority for NOAA. We believe that creating an incentive program to encourage vessels to travel at slow speeds could be a benefit to the people and the whales offshore of California.

To be successful, the development of an incentive based slow speed initiative will require collaboration with the shipping industry and other partners. We have been in discussion with the Santa Barbara Air Pollution Control District regarding the viability of this idea and look forward to working with them and CARB to develop the idea further. We have reached out to a number of partners, including the Marine Exchanges of California, the Pacific Merchant Shipping Association, and the Sanctuary Advisory Council of Channel Islands National Marine Sanctuary (i), and received general support for what we all believe is an idea worthy of further consideration (see attached letter of support).

Thank you for your consideration of using cap and trade auction proceeds to incentivize ocean-going vessels to reduce speed and greenhouse gas emissions, and to protect endangered whales. Please contact Sean Hastings, Channel Islands National Marine Sanctuary, sean.hastings@noaa.gov or (805) 884-1472 and/or Elizabeth Petras,

National Marine Fisheries Services, Southwest Region,  
Elizabeth.petras@noaa.gov or (562)980-3238 if you have any  
questions.

Sincerely,

Rodney McInnis  
Regional Administrator  
Southwest Regional Office  
National Marine Fisheries Service

William Douros  
Regional Director  
West Coast Region  
Office of National Marine Sanctuaries

cc:  
Channel Islands Sanctuary Advisory Council  
Louis D. Van Mullem Jr., Air Pollution Control Officer, Santa  
Barbara Air Pollution Control District

Enclosure:  
Channel Islands Sanctuary Advisory Council Support Letter

i. In 2009, a report endorsed by the Sanctuary Advisory Council of  
Channel Islands National Marine Sanctuary recommended that  
incentive-based approaches to slow ships down be explored,  
specifically, to reduce ship strike risks on endangered whales.  
See: "Reducing the Threat of Ship Strikes on Large Cetaceans in the  
Santa Barbara Channel Region and Channel Islands National Marine  
Sanctuary: Recommendations and Case Studies" available online at:  
<http://channelislands.noaa.gov/sac/pdf/sscs10-2-09.pdf>.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/123-  
nmfs\\_onms\\_carbletter\\_incentivize\\_ships\\_reduce\\_speed.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/123-nmfs_onms_carbletter_incentivize_ships_reduce_speed.pdf)

Original File Name: NMFS\_ONMS\_CARBletter\_incentivize\_ships\_reduce\_speed.pdf

Date and Time Comment Was Submitted: 2012-06-22 15:24:18

No Duplicates.

## **Comment 116 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Jay  
Last Name: Chamberlin  
Email Address: jchamberlin@parks.ca.gov  
Affiliation: California State Parks

Subject: Auction Revenue Investments  
Comment:

Hon. Mary Nichols  
Chair  
California Air Resources Board  
1101 I Street  
Sacramento, CA 95814

Dear Chair Nichols:

California State Parks appreciates the opportunity to provide comments to the California Air Resources Board on its evolving Investment Strategy for Cap-and-Trade Auction Proceeds.

As a state agency, State Parks is committed to reducing its Greenhouse Gas (GHG) footprint. In many respects, the largest contribution State Parks can provide to our collective efforts to address climate change is by continuing and expanding the stewardship of the large natural landscapes under its jurisdiction.

That stewardship has for many years included natural resource protection and management, including the restoration of degraded landscapes such as coastal dune and wetland ecosystems, the protection and maintenance of riparian habitats, treatment and management of exotic species, and management of forested ecosystems.

Today, our forest management program includes natural management of extensive groves of old-growth coast redwood and giant sequoia stands, along with nearly every other major native forest community in California. Our efforts to protect these landscapes utilize tools such as forest thinning and prescribed fire to improve the natural diversity and resilience of these forests. An important co-benefit of this management includes significant GHG benefits.

Forest restoration work has been demonstrated to provide GHG benefits on both sides of the accounting ledger - by improving the natural uptake of CO<sub>2</sub> and by reducing the severity of uncontrolled wildfires and the concomitant catastrophic release of GHGs during wildfire events.

Along with the restoration and management of other native landscapes, State Parks forested landscapes can thus contribute significantly to California's plans to mitigate climate impacts just as they play a key role in our statewide adaptation strategies. However, our current natural resource management

program is able to restore resilience in only a small percentage of native ecosystems - and address only a tiny fraction of our at-risk forests -- each year. The Department's current budget reductions hamper our ability to increase these efforts.

In 2008, State Parks began a reforestation project at Cuyamaca Rancho State Park that will eventually sequester between 440,000-700,000 metric tons of CO2 equivalents. While undertaking many similar Climate Action Reserve-registered projects at State Parks is unlikely, this effort has built capacity within State Parks to quantify GHG reductions that extend to the landscape scale (i.e., beyond project-specific accounting).

As you know, the AB 32 Scoping Plan already includes recognition of the importance of sustainable forest practices as a GHG reduction strategy, and the Cap and Trade rule explicitly recognizes management of public forests as a potential GHG reduction strategy. Building on these efforts, State Parks believes that investments in State Park natural resource protection and management are worthy of a dedicated portion of future auction revenues.

Many thanks for your continued efforts to address climate change. We look forward to working with your staff and our collaborating agencies, NGOs, and members of the research community to more fully develop the framework for these important investments.

Sincerely,

Jay Chamberlin  
Chief, Natural Resources Division

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/124-csp-auction\\_revenue\\_investments\\_6.22.2012.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/124-csp-auction_revenue_investments_6.22.2012.pdf)

Original File Name: CSP- Auction Revenue Investments\_6.22.2012.pdf

Date and Time Comment Was Submitted: 2012-06-22 16:42:14

No Duplicates.

## **Comment 117 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Searle  
Last Name: Whitney  
Email Address: sWhitney@HowMany.org  
Affiliation: Institute for Population Studies

Subject: Cost-Effective Investment of Cap-and-Trade Funds to Meet AB 32 Goals  
Comment:

June 22, 2012

The Honorable Mary D. Nichols, Chair  
California Air Resources Board (CARB)  
1001 I Street, P.O. Box 2815  
Sacramento, California 95812

Dear Ms. Mary D. Nichols,

Ensuring public health in the state of California through cost-effective reduction of greenhouse gas emissions is a top priority mandated by AB 32, the Global Warming Solutions Act. In addition to the importance of reducing consumption and emissions through clean energy investments, we write to express our support for directing a portion of cap-and-trade funds to women's reproductive health services, one of the most cost-effective means of meeting this mandate.

We the cost per ton of carbon emissions reduction is between \$2.11 and \$7.00 by means of family planning. We believe these numbers are compelling.

Just as California is leading the nation in the CARB initiative, so too must we lead by directing a portion of these proceeds to voluntary family planning programs and organizations that are working to help women avoid pregnancies they do not want, and plan pregnancies they do want. We understand and appreciate this initiative would be breaking new ground, and are pleased to meet with you or your staff if you think that useful. We are also available to be represented at any public hearings, or otherwise support your important agenda in any way possible.

Sincerely,  
Searle Whitney, President  
Institute for Population Studies (IPS)

Enclosures (2)

cc:  
Martha Campbell, President, Venture Strategies for Health and Development  
Malcolm Potts, Chair, Bixby Center for Population, Health and Sustainability, UC Berkeley

Footnotes:

1. Biggs M. Antonia; Foster, D.; Hulett, D. Cost-Benefit Analysis of the California Family PACT Program for Calendar Year 2007, San Francisco, CA. Submitted to the California Department of Public Health, Office of Family Planning Division. Page 16, April 2010. [http://bixbycenter.ucsf.edu/publications/files/FamilyPACTCost-BenefitAnalysis2007\\_2010Apr.pdf](http://bixbycenter.ucsf.edu/publications/files/FamilyPACTCost-BenefitAnalysis2007_2010Apr.pdf)
2. Actual cost to CA per safe prevention may actually be significantly lower because expenditures of \$437.3 million include all PACT services, not just family planning services. Biggs M. Antonia; Foster, D.; Hulett, D. Cost-Benefit Analysis of the California Family PACT Program for Calendar Year 2007, San Francisco, CA. Submitted to the California Department of Public Health, Office of Family Planning Division. Page 15, April 2010. [http://bixbycenter.ucsf.edu/publications/files/FamilyPACTCost-BenefitAnalysis2007\\_2010Apr.pdf](http://bixbycenter.ucsf.edu/publications/files/FamilyPACTCost-BenefitAnalysis2007_2010Apr.pdf)
3. The World Bank: CO2 emissions (metric tons per capita). June 2, 2012. <http://data.worldbank.org/indicator/EN.ATM.CO2E.PC>
4. Potts, Malcolm; Marsh, Leah. The Population Factor: How does it relate to climate change? Bixby Center for Population, Health and Sustainability at University of California, Berkeley. February 2010.
5. Wire, Thomas. Fewer Emitters, Lower Emissions, Less Cost. London School of Economics & Population Matters. August 2009. [http://populationmatters.org/documents/reducing\\_emissions.pdf?phpMyAdmin=e11b8b687c20198d9ad050fbb1aa7f2f](http://populationmatters.org/documents/reducing_emissions.pdf?phpMyAdmin=e11b8b687c20198d9ad050fbb1aa7f2f)
6. Murtaugh, Paul A.; Schlax, Michael G. Reproduction and the carbon legacies of individuals, Department of Statistics, Oregon State University, Corvallis; College of Oceanic and Atmospheric Sciences, Oregon State University, Corvallis. 2009.
7. Facts on Unintended Pregnancy in the United States. The Guttmacher Institute, January 2012. <http://www.guttmacher.org/pubs/FB-Unintended-Pregnancy-US.html#6>
8. Frost, Jennifer J., DrPH; Finer, Lawrence B., PhD; Tapales, Athena, PhD. Journal of Health Care for the Poor and Underserved, The Impact of Publicly Funded Family Planning Clinic Services on Unintended Pregnancies and Government Cost Savings. 2008. [http://www.guttmacher.info/pubs/09\\_HPU19.3Frost.pdf](http://www.guttmacher.info/pubs/09_HPU19.3Frost.pdf)

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/125-cap-and-trade\\_investment\\_in\\_family\\_planning\\_institute\\_for\\_population\\_studies.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/125-cap-and-trade_investment_in_family_planning_institute_for_population_studies.pdf)

Original File Name: Cap-and-Trade Investment in Family Planning\_Institute for Population Studies.pdf

Date and Time Comment Was Submitted: 2012-06-22 16:35:35

No Duplicates.



## **Comment 118 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Barry

Last Name: Vesser

Email Address: bvesser@climateprotection.org

Affiliation: Climate Protection Campaign

Subject: Comment on Investment of Cap-and-Trade Auction Revenue

Comment:

Dividends are the most effective use of revenue

We believe that the best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend or rebate. The ARB has divided the carbon market into three sectors: industrial, electricity, and transportation. The electricity sector will likely see rebates to electricity customers, based on the proceeding currently held at the California Public Utility Commission. Based on the discussion at this proceeding there is a real question whether low income ratepayers will be eligible for these rebates, since they are covered by the CARE program, so their rates are already subsidized.

The group that studies have shown will most negatively impacted by a carbon price will likely end up an increased burden relative to other income groups, unless the other two sectors also include rebates to California households. Even if the PUC ruling protects low income residents in the utility sector since costs from the carbon price will be passed down to them in the other sectors as well, we believe they should be include dividends as well.

UCLA issued a report on legal risk of various uses of cap-and-trade revenues due to the Sinclair Paint nexus issues related to use of revenue from a fee. The report concluded that projects resulting in direct GHG reductions are most likely to be seen in court as advancing the objectives of AB32. Next in line are expenditures that accomplish the additional goals of AB32 relating to equity, and maximizing additional environmental, economic, and overall societal benefits. Unfortunately, the UCLA report considered those additional goals to only apply to expenditures in environmental justice communities, but overlooked how they could apply to universal dividends. AB32 explicitly requires that the Air Resources Board:

- "Design the regulations in a manner that is equitable;"
- "Maximize additional environmental and economic benefits for California;"
- "Consider overall societal benefits, including reductions in other air pollutants, diversification of energy sources, and other benefits to the economy, environment, and public health."

Dividends help accomplish all of these goals.

Furthermore, the moral basis for distributing proceeds of a sale of pollution rights to the atmospheric commons must be grounded in justice and equity, and the simplest formula to accomplish this is a per capita dividend.

We request that ARB include dividends within its investment plan. In these times of economic austerity, it should be easier for the state legislature to pass a bill that allocates revenues to all of



Californians, than for any specific project or investment approach.

We disagree with the analysis of the UCLA report for the reasons stated previously that returning funds as dividends to the public is as high risk under Sinclair, but in any case, the State has a compelling interest to defend and approach that is fair and will secure the long term viability of the Cap and Trade Program. Weakness of purely investments approach to revenue allocation, especially large infrastructure such as high-speed rail

The panelists at the May 24, 2012 ARB workshop on this topic expressed support for a long list of programs including local government programs, research and development, and projects in sectors such as energy and water, transit, environmental education or health studies in disadvantaged communities, and natural resources such as urban forests or in the Bay Delta. Many of these projects are worthy of consideration.

There are two main issues presented by an strictly investments approach. 1) How to decide between the myriad of investment strategies and projects over multiple sectors? 2) What is the correct amount of investment to fund with AB32 revenue to insure effective implementation and positive public perception of the program.? Deciding between projects will be a politically contentious problem, time consuming for ARB staff resources and the legislature and will likely require a high level of staff resources to continue to manage and monitor. Dividends provide a partial solution to these issues for ARB by reducing the amount of revenue for investments.

Although a large existing project, like high-speed rail, might also help ameliorate some of these issues, the problem with multi-billion dollar infrastructure projects such as this is that they could easily swallow up all the revenues from cap and trade, yet still be unable to contribute significantly to the state's GHG reduction goals by 2020. Investing solely in such projects will not broaden bipartisan public support for a continuously increasing price on carbon. Big projects will also do nothing to counter the criticism that a carbon price is a regressive tax.

There are also better sources of funding for investments in renewables and efficiency. Proceeds from the Cap & Trade program are not a good source of funding. The amount will fluctuate, and we don't know how much it will be, making planning and effective program delivery a challenge. A better source for the investments would be to reroute fossil fuel subsidies or existing subsidies for activities that cause emissions. In California, taxpayer funds are being continually invested in the parking structures, new highway lanes and widening roads, resulting in higher GHGs.

Suggested framework for an Investment Plan based on the EAAC recommendations: 75% Dividend, 25% investments

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/126-arb\\_commmnet\\_ltr\\_c\\_t\\_revenue\\_final\\_2012.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/126-arb_commmnet_ltr_c_t_revenue_final_2012.pdf)

Original File Name: ARB Commnet Ltr C&T Revenue Final 2012.pdf

Date and Time Comment Was Submitted: 2012-06-22 16:41:15

No Duplicates.

## **Comment 119 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Alex  
Last Name: Leumer  
Email Address: aleumer@tnc.org  
Affiliation: The Nature Conservancy

Subject: SCAPOSD comments re: auction proceeds  
Comment:

Dear Chair Nichols and members of the California Air Resources Board:  
Thank you for hosting the public consultation on the investment of AB 32 cap and trade auction proceeds on May 24, 2012. On behalf of the Sonoma County Agricultural Preservation and Open Space District, we are writing to encourage the California Air Resources Board to design an investment plan that includes funds for greenhouse gas reductions achieved through natural resource protection and to permit counties, and their special districts, to be eligible to receive such funds. Counties play a critical and much needed role in land use, conservation and climate change. Through local land use decisions, programs, and land acquisitions counties can conserve and restore natural and working lands and promote the removal of additional carbon dioxide from the atmosphere and minimize greenhouse gases. These actions not only help protect the climate, but help clean our air and water, protect communities from against severe weather events, and provide fish and wildlife habitat, as well as resource-related jobs in our community. Directing investments in natural resource protection through counties can play a powerful and complementary role to help the state meet its greenhouse gas target for forests and promote effective sustainable communities strategies pursuant to Senate Bill 375. The provision of auction revenue to counties will help ensure that we can play a key role in addressing climate change and achieving these public benefits. We support a clear role for counties and natural resource protection as eligible categories for receipt of allowance revenue pursuant to AB32, and thank you for your consideration. Thank you for the opportunity to provide comments.  
Sincerely,  
Bill Keene, General Manager

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/127-ab\\_32\\_auctionproceedltr\\_arb\\_scaposd\\_6-22-12.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/127-ab_32_auctionproceedltr_arb_scaposd_6-22-12.pdf)

Original File Name: AB 32 AuctionProceedLTR ARB\_SCAPOSD\_6-22-12.pdf

Date and Time Comment Was Submitted: 2012-06-22 16:55:43

No Duplicates.

**Comment 120 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Edwards

Email Address: bedwards57@comcast.net

Affiliation:

Subject: cap and trade

Comment:

There are no bounds to the corruption by the state of California. Obama is on his way out, yet you continue to try to steal every last cent you can from the people of California. This outrage will not succeed. I don't usually engage in active politics, but I plan to do every thing in my power to stop this crime against the people.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-22 16:49:47

No Duplicates.

**Comment 121 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Erik

Last Name: Holst

Email Address: ombcomm@arb.ca.gov

Affiliation: Environmental Defense Fund

Subject: Investment of Cap and Trade Auction Proceeds

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/129-edf\\_comment\\_\\_2\\_\\_on\\_auction\\_proceeds\\_062212.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/129-edf_comment__2__on_auction_proceeds_062212.pdf)

Original File Name: EDF Comment (2) on Auction Proceeds 062212.pdf

Date and Time Comment Was Submitted: 2012-06-25 13:00:05

No Duplicates.

**Comment 122 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: ombcomm@arb.ca.gov

Affiliation: The Nature Conservancy

Subject: Comments on Investment of Cap and Trade Auction

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/130-groupstatement05\\_24\\_12workshop.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/130-groupstatement05_24_12workshop.pdf)

Original File Name: GroupStatement05\_24\_12Workshop.pdf

Date and Time Comment Was Submitted: 2012-06-25 13:04:15

No Duplicates.

**Comment 123 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Julie  
Last Name: Snyder  
Email Address: ombcomm@arb.ca.gov  
Affiliation: Housing California

Subject: Comments on Investment of Cap and Trade Auction Proceeds  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/131-ltr\\_to\\_arb\\_final\\_6-22-12.docx](http://www.arb.ca.gov/lists/investmentplan-ws/131-ltr_to_arb_final_6-22-12.docx)

Original File Name: Ltr to ARB FINAL 6-22-12.docx

Date and Time Comment Was Submitted: 2012-06-25 13:07:19

No Duplicates.

**Comment 124 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Ellen

Last Name: Luu

Email Address: ombcomm@arb.ca.gov

Affiliation: Global Green USA

Subject: comments on investment of Cap&Trade auction proceeds

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/132-global\\_green\\_usa\\_comments\\_on\\_ct\\_revenue\\_\\_06-22-12\\_.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/132-global_green_usa_comments_on_ct_revenue__06-22-12_.pdf)

Original File Name: Global Green USA comments on CT Revenue (06-22-12).pdf

Date and Time Comment Was Submitted: 2012-06-25 13:09:22

No Duplicates.



**Comment 125 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Rob  
Last Name: Berner  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: AB 32 Investment  
Comment:

see attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/133-marin\\_ag\\_land\\_trust.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/133-marin_ag_land_trust.pdf)

Original File Name: Marin Ag Land Trust.pdf

Date and Time Comment Was Submitted: 2012-06-26 08:13:14

No Duplicates.

## **Comment 126 for Public Input on Cap-and-Trade Auction Proceeds (investmentplan-ws) - 1st Workshop.**

First Name: Michael

Last Name: Lane

Email Address: ombcomm@arb.ca.gov

Affiliation: Non-Profit Housing Association of Northe

Subject: Expenditure plan for cap and trade auction revenues

Comment:

Dear Chair Nichols:

On behalf of the Non-Profit Housing Association of Northern California (NPH), I write to urge you to include transit-oriented affordable housing as an eligible category and key component of the expenditure plan for cap and trade auction revenues under AB 32.

NPH is the collective voice of those who support, build, and finance affordable housing. We promote the proven methods of the non-profit sector and focus government policy on housing solutions for lower income people who suffer disproportionately from the housing crisis.

Investment in the sustainable development and preservation of affordable housing will help the state meet its greenhouse gas reduction goals while also benefiting disadvantaged communities. When affordable homes are located near transit stations, low-income residents are more likely to use alternative transportation, reducing their reliance on car commuting. Providing energy efficient affordable housing, in the form of both newly constructed and retrofitted homes and locating them near transit stations will help to reduce our state's carbon emissions. Cap and trade funds should also be utilized to retrofit older affordable housing properties in order to incorporate new green building and energy efficiency features.

It is our position that an affordable housing component as outlined above must be a central part of any greenhouse gas reduction strategy funded by cap and trade auction proceeds.

We thank you for the opportunity to provide this input.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-06-26 08:17:39

No Duplicates.

**Comment 127 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Beth

Last Name: Vaughan

Email Address: ombcomm@arb.ca.gov

Affiliation: California Cogeneration Council

Subject: CAP AND TRADE AUCTION PROCEEDS

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/135-6-26-12\\_ccc\\_letter\\_re\\_auction\\_proceeds.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/135-6-26-12_ccc_letter_re_auction_proceeds.pdf)

Original File Name: 6-26-12\_CCC\_letter re Auction Proceeds.pdf

Date and Time Comment Was Submitted: 2012-06-27 10:41:25

No Duplicates.

**Comment 128 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Mike  
Last Name: Sandler  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Comments on Investment of Cap and Trade Auction  
Comment:

Dear Chair Nichols, Mr. Goldstene, and Mr. Cliff,

I have attached a flier on "How to Spend the Revenues from an Auction" that you may find relevant to the development of ARB's Investment Plan.

I had this flier made several years ago, and may have submitted it during public comment on the Scoping Plan, but going through my files I see it is again very timely.

I also would encourage you to speak with Dallas Burtraw about the "cap as a floor on emissions" problem, where investments that reduce emissions under the cap simply free up emissions in other capped sectors. Chuck Shulock referred to it in his public comments as well.

Thank you for your consideration.

Sincerely,

Mike Sandler

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/136-howtospendtherevenues3\\_8x11pdf.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/136-howtospendtherevenues3_8x11pdf.pdf)

Original File Name: Howtospendtherevenues3\_8x11PDF.pdf

Date and Time Comment Was Submitted: 2012-06-27 10:44:34

No Duplicates.

**Comment 129 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Pfeffer

Email Address: ombcomm@arb.ca.gov

Affiliation: Gateway Cities Council of Governments

Subject: Response to CARB Questions on Investment of Cap and Trade Auction Revenues

Comment:

see attachment

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/137-gateway\\_cities\\_council\\_of\\_gov.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/137-gateway_cities_council_of_gov.pdf)

Original File Name: Gateway Cities Council of Gov.pdf

Date and Time Comment Was Submitted: 2012-06-27 12:56:47

No Duplicates.

**Comment 1 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws). (At Workshop)**

First Name: Barry R.  
Last Name: Wallerstein  
Email Address: mfarr@arb.ca.gov  
Affiliation: South Coast AQMD

Subject: Recommendations for Investment Plan for Cap-and-Trade Auction Proceeds  
Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/13-south\\_coast\\_aqmd.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/13-south_coast_aqmd.pdf)

Original File Name: South Coast AQMD.pdf

Date and Time Comment Was Submitted: 2012-06-05 14:31:25

No Duplicates.

**Comment 2 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws). (At Workshop)**

First Name: Mike

Last Name: Mielke

Email Address: mmielke@svlg.org

Affiliation: Silicon Valley Leadership Group

Subject: Invest in a Clean Energy Future and a Healthy Environment: AB 32 Cap-and-Trade  
Revenue Use

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/15-silicon\\_valley\\_leadership\\_group.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/15-silicon_valley_leadership_group.pdf)

Original File Name: Silicon Valley Leadership Group.pdf

Date and Time Comment Was Submitted: 2012-06-05 14:46:00

No Duplicates.

**Comment 3 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws). (At Workshop)**

First Name: Russell

Last Name: Henly

Email Address: mfarr@arb.ca.gov

Affiliation: California Forestry and Fire Protection

Subject: Forestry and Cap and Trade Auction Proceeds

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/16-forestry\\_and\\_fire\\_protection.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/16-forestry_and_fire_protection.pdf)

Original File Name: Forestry and Fire Protection.pdf

Date and Time Comment Was Submitted: 2012-06-05 14:54:28

No Duplicates.



**Comment 4 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws). (At Workshop)**

First Name: Jeff

Last Name: Lassle

Email Address: mfarr@arb.ca.gov

Affiliation:

Subject: Reparations to the Regulatory Class in California

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/17-lassle\\_brown.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/17-lassle_brown.pdf)

Original File Name: Lassle\_Brown.pdf

Date and Time Comment Was Submitted: 2012-06-05 15:00:13

No Duplicates.

**Comment 5 for Public Input on Cap-and-Trade Auction Proceeds  
(investmentplan-ws). (At Workshop)**

First Name: Assemblywoman Diane

Last Name: Harkey

Email Address: mfarr@arb.ca.gov

Affiliation: Assembly California Legislature

Subject: Testimony regarding Public Consultation of Investment of Cap-and-Trade Auction Proceed

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/investmentplan-ws/18-assemblywoman\\_diane\\_harkey.pdf](http://www.arb.ca.gov/lists/investmentplan-ws/18-assemblywoman_diane_harkey.pdf)

Original File Name: Assemblywoman Diane Harkey.pdf

Date and Time Comment Was Submitted: 2012-06-05 15:02:43

No Duplicates.