

Comments to AB 32 Scoping Plan Update due 8.5.2013

This update does not fully reflect all the State agencies necessary to execute reduction.

Although you mention the Department of Conservation in relationship to AGRICULTURE and NATURAL AND WORKING LANDS, missing specifically is the Division of Oil, Gas and Geothermal DOGGR. Fracking and methane outgassing from old oil fields, landfills and other contributors could skew any reductions in greenhouse gases.

Southern California, Santa Barbara and San Joaquin Valley are areas of Monterey Shale. ENERGY needs to be addressed.

You have also downplayed the introduction of AIR QUALITY MANAGEMENT DISTRICTS into the picture.

Scoping Update needs to be revised as to governance structures.

Also not mentioned, are Exchange-Traded Contracts and the organization governance and authorities.

Offsets should be included in the Scoping.

Not mentioned are Local Government agencies that may have jurisdiction because of ownership such as the Los Angeles Department of Water and Power.

Time frame is until 2020. Will jurisdictions over these reductions be eligible to be transferred? We are not clear why a financial market has been established, when the reduction level compliance is sunseted.

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