

P.O. Box 3357  
Bakersfield, CA 93385  
November 19, 2008

Dear CARB Board members:

Thank you for your hard work so far envisioning a plan to implement the Global Warming Solutions Act.

We have a few suggestions to make this plan even stronger. We hope you will consider them during your meeting.

- **Double the 2020 land use target to 11-14 MMT** so that local governments reduce emissions caused by poorly planned growth that drives up vehicle miles traveled. This would also help to set a realistic benchmark for SB 375 implementation.
- **Support a strong feed-in tariff program** to replace the existing dysfunctional system. Having operated successfully in Germany and many other countries, feed-in tariffs are efficient tools for speeding adoption of renewable electricity generation to offset GHG emissions from natural gas fired power plants.
- CARB should **support a statewide GHG Indirect Source Rule (ISR)** such as the existing ISR in the San Joaquin Valley extended to include greenhouse gasses and the criteria pollutants not covered by the existing ISR. In order for ISR to be effective in reducing VMT, it should discourage developers from building far from existing services and jobs, and it should encourage close-in development. To this end, the amount of the fee should be proportional to the VMT, and the computer model used to compute a project's emissions should accurately account for the individual project's VMT.
- **CEQA significance thresholds** for GHG emissions should be zero or very low so that GHG mitigation is required of most new projects.
- CARB should encourage local governments to raise funds to be used to reduce VMT or for other related GHG reduction measures (perhaps by imposing a **GHG surcharge on the local transportation impact fee or a GHG surcharge on local individual electricity bills**). Such monies could be used to fund upgraded public transportation, other VMT reduction measures, to fund a solar PV rebate program like Lemoore's, or to fund other solar incentive programs. A GHG surcharge on the local transportation impact fee should be proportional to project VMT.
- Please **auction off all emission allowances**. Program revenues should go toward GHG reduction programs, such as clean technologies, green jobs, and aid for low-income consumers and small businesses to reduce their utility bills.

- **Reduce the role of offsets** in the Plan. Providing too many offsets encourages continuing emissions in low-income neighborhoods and in defenseless habitats, and weakens the demand for clean energy technology innovation. Limiting offsets will create more clean-energy jobs, stimulating our state's economy.
- Require a **transfer fee on all new housing**. The transfer fee would apply to each future sale and would go to the regional Air District for GHG reduction projects.
- Please require **businesses to recycle their materials**.

The Center for Biological Diversity in their September, 2007, report entitled *The California Environmental Quality Act – On the Front Lines of California's Fight Against Global Warming*, states, "The importance of reducing greenhouse gas pollution cannot be overstated: reductions made today not only make economic sense, but will determine the type of climate and quality of life experienced by our children and grandchildren." We appreciate CARB's efforts to this end in the Scoping Plan, and we ask that you strengthen it by incorporating the suggestions above.

Sincerely,

A handwritten signature in blue ink that reads "Gordon L. Nipp". The signature is written in a cursive, flowing style.

Gordon & Eva Nipp