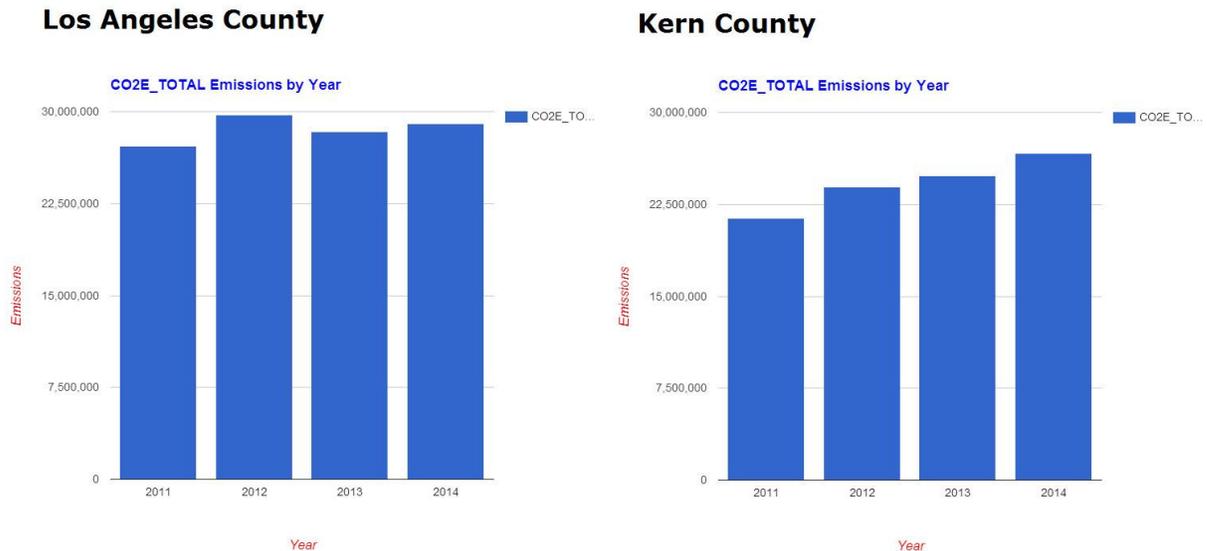


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A few comments on the Adaptive Management Plan for the consideration of the EJAC.

The Adaptive Management Plan is, in part, a procedure where CARB will monitor increases in GHG emissions to see if they are caused in any way by the Cap and Trade regulation. If there is any link, then CARB will also analyze if there has been a corresponding increase in criteria air pollutants which may have adverse impacts on local air quality.

Using the mapping tool for this plan, it is apparent that in the years 2011 to 2014 there were dramatic increases in GHG emissions in Kern County. During the same period there were also substantial GHG emissions in LA County. The chart below comes directly from the mapping tool and shows these increases clearly.



Apparently, GHG emissions from major industrial sources increased by approximately 2 million tons of CO2e in LA County and by 7 million tons of CO2e in Kern County over the four year period. This was during a time when emissions of GHG were supposed to be declining by approximately 3 million tons annually in order for the state to meet the 2020 target.

CARB has claimed that California is on track to meet its 2020 goals and that the carbon intensity of the economy is decreasing. The data above shows that CARB is not currently decreasing GHG emissions very effectively in California. If CARB simply claims that the increases shown above are due to increased economic activity then the claim of decreased carbon intensity is also meaningless.

In the spirit of the Adaptive Management Plan, the EJAC should recommend a thorough study and report of these emission increases in each county which must have been mostly from industrial sources regulated under Cap and Trade. The study should show clearly the reason for these increases and which sectors were the most responsible. Any possible link to Cap and Trade, either directly or indirectly, should be noted. The study should estimate the criteria air pollutant increases associated with these increases in GHG emissions and which communities in these counties are closest to the facilities which have been increasing their emissions.