

**Subject:** ETAAC Meeting Comment

**From:** James Fine <JFine@environmentaldefense.org>

**Date:** Thu, 29 Nov 2007 15:22:36 -0500

**To:** schurch@arb.ca.gov

Hi Steve,

I write to submit the following comment to ETAAC's meeting today, as well as to confirm that you've received written comments that I submitted on the 27<sup>th</sup>.

Pertaining to the draft discussion report, I have two major critical comments to contribute to the meeting today:

1. No clear mechanism is suggested to assure that the California Climate Trust will "empower environmental justice communities." Several priorities for the Ca Climate Trust investments are listed, but there is no treatment of the unfortunately reality that these many laudable priorities may not all be achievable. So how will we select amongst them? The ETAAC report is an opportunity to provide fundamental guidance to CARB on this challenging issue.
2. There is an implicit focus on cost effectiveness evaluative criteria. Though fundamental, cost effectiveness should not be the ONLY criterion used, so the ETAAC report ought to highlight the need to consider, at least, equity and innovation incentives, and to recognize that in many instances good investments toward clean tech may not be attractive from a strict perspective of cost effectiveness. Next 10 is making this point as I type this email!

Thank you.

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