

**Comment 1 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Ken

Last Name: Johnson

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

Affiliation:

Subject: Project alternatives

Comment:

Please see the attachment.

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/2-ceqa\\_comments\\_kenjohnson.pdf](http://www.arb.ca.gov/lists/ceqa-sp08/2-ceqa_comments_kenjohnson.pdf)

Original File Name: CEQA\_Comments\_KenJohnson.pdf

Date and Time Comment Was Submitted: 2008-11-10 16:12:39

No Duplicates.

## **Comment 2 for CEQA (ceqa-sp08) - 45 Day.**

First Name: David  
Last Name: Schonbrunn  
Email Address: David@Schonbrunn.org  
Affiliation:

Subject: The Alternatives Analysis is Flawed  
Comment:

The rationale for discarding Alternative 5, the carbon fee, is entirely based on conjecture. Cap-and-trade is asserted to provide certainty as to emissions reductions. This is blatantly incorrect, as Europe learned recently.

The initiation of a cap-and-trade system requires the development of vast new complex institutions, and depends on highly educated, highly paid professionals, operating without transparency. This is a recipe ripe for manipulation. Consider the sub-prime mortgage and credit default swap crisis as a foretaste of the shennanigans that cap-and-trade are likely to bring. That crisis has taught us that a system that can only be understood by specialized PhDs is not robust enough to base an economy on. The very popularity of cap-and-trade with the business community ought to raise red flags as to whether the public interest will be endangered.

A carbon tax, on the other hand, will be very simple to implement. The institutions are mostly in place already. While more accountants will need to be hired to assume the larger responsibilities of a carbon tax system, nothing exotic is needed. It will be easy to catch bad actors.

And should monitoring determine that the trend line of GHG reductions is not steep enough, the tax can easily be adjusted. This isn't rocket science. Cap-and-trade, on the other hand, IS rocket science.

I request that Paragraph G on page J-87, the analysis for Alternative 5, be withdrawn and be recirculated with a conclusion consistent with the comments above.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 01:25:02

No Duplicates.

**Comment 3 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Eric

Last Name: Bever

Email Address: ericbever@ci.costamesa.ca.us

Affiliation:

Subject: CITY OF COSTA MESA COMMENTS ON CARB PROPOSED SCOPING PLAN

Comment:

Please note the attached letter and the City of Costa Mesa's current Council Policy, below, on the City's stance relating to environmental sustainability and the CARB proposed Scoping Plan.

Thank you for the opportunity to comment on this matter.

Mayor Eric R. Bever

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/4-ab\\_32\\_and\\_cp500-14\\_11-08.pdf](http://www.arb.ca.gov/lists/ceqa-sp08/4-ab_32_and_cp500-14_11-08.pdf)

Original File Name: AB 32 and CP500-14 11-08.pdf

Date and Time Comment Was Submitted: 2008-11-19 06:59:04

No Duplicates.

## **Comment 4 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Jim

Last Name: Stewart

Email Address: Jim@EarthDayLA.org

Affiliation: Sierra Club CA Climate-Energy Comm.

Subject: Carbon fees are preferable to cap-and-trade

Comment:

Sierra Club California Comment on Scoping Plan Appendix J CEQA Analysis

The brief summaries in Appendix J, pages J-85-87, of why ARB staff believes a cap-and-trade approach is superior to carbon fees, disregard real world experience so far with cap-and-trade.

ARB staff simply asserts (p. J-87), "While a carbon fee and a cap-and-trade program provide very similar economic incentives to those covered, a carbon fee does not provide certainty in terms of the amount of emission reductions that will be achieved. The cap-and-trade program, on the other hand, which provides a firm cap on 85 percent of the state's greenhouse gas emissions, increases California's certainty in meeting the 2020 target, and provides a robust mechanism to achieve the additional reductions needed by 2050."

Whether it be the problems with RECLAIM in the South Coast AQMD, or Europe's bungled attempt at trading, cap-and-trade is no panacea. It is much less likely to lead to achieving a firm cap, compared to a combination of regulations, with financing of reductions with carbon fee income.

In fact a carbon fee is markedly superior to cap-and-trade for the following reasons:

1. Such a fee would benefit businesses since a carbon fee would reduce risks and aid business planning, because the price is more predictable than the outcome of a cap and trade/auction.
2. In addition, such a fee would provide a predictable source of income for the state to put into Scoping Plan implementation.
3. Under the precedent of the Sinclair Paint case, expenditures of revenue from carbon fees must be related to the issue of carbon emissions. On the other hand, auction revenues could be appropriated by the legislature for any purpose they want, including deficit reduction, which would have zero impact on GHG emissions.
4. Fees can be imposed on all carbon sources, rather than only on the sector of large producers. This accomplishes the following goals: a) it allows a much lower carbon rate per ton to raise the same amount of money, b) it distributes the cost burden between all sectors, c) it insures that the cost rate is low enough that it will not be disruptive to industries or consumers, d) it provides

equity between sectors. In California a modest fee of \$4 per ton on all the state's emissions (currently about 500 million tons) could collect about \$2 billion in revenue. ARB's planned "cap and trade" market system accounts for 20% of 174 million tons reduction target (34.4 million tons). To raise the same revenue from this 34.4 million ton basis would require a carbon auction price over \$58 per ton, a price that is very doubtful given recent experience with auctions in the US trading at under \$5 per ton. As for consumer impact, a \$4 per ton rate would add about 4 cents per gallon for gasoline, and 0.1 to 0.3 cent per kilowatt-hour for most California electric utility customers. (Likely, there would not be a strong consumer reaction, compared to a \$58 per ton price.)

5. Fees also eliminate the "loopholes" of offsets that create many regulatory and compliance problems, as well as huge potential environmental justice issues.

6. Fees avoid much of the high transaction costs associated with auctions. They can be designed to avoid the fate of the auction in the northeastern US where the bid price for RGGI permits of \$3 per ton barely covered the cost of the auction.

7. Auctions could raise some initial money to benefit the state, but then market traders who bought the credits have the chance to resell the credits, thus reaping profits for themselves but not benefiting the climate. (For example, traders who bought the RGGI permits for \$3 per ton are now reselling them for over \$4 per ton, but none of those millions of dollars of trading profits are benefiting the climate.)

8. Offsets would be allowed under cap-and-trade, which require expensive verification procedures, as well as controversy over location (in-state, regional, international?).

9. Cap-and-trade creates huge environmental justice equity problems, which can be more fairly dealt with using a targeted combination of regulations and financing mechanisms from a carbon fee.

10. The bottom line is that the combination of regulations and financing reduction measures with fee income can be more easily adjusted to achieve the firm cap.

We conclude that the language in Alternative 5 wrongly condemns carbon fees. Carbon fees are much preferable to cap-and-trade to achieve the goals of AB 32.

Sierra Club California said to ARB in our Nov. 19 Comments on Proposed AB 32 Scoping plan that "Sierra Club urges CARB consider the merits of replacing cap and trade with a carbon fee. CARB has not given this fee option the attention or study it merits."

Jim Stewart, PhD, Co-chair  
Sierra Club California Climate-Energy Committee

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-30 22:31:14

No Duplicates.

**Comment 5 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Matt

Last Name: Vander Sluis

Email Address: mvander@pcl.org

Affiliation: Planning and Conservation League

Subject: PCL Comments on Proposed Scoping Plan

Comment:

Thank you for accepting these comments into the record.

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/6-pcl\\_comments\\_on\\_ab\\_32\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/ceqa-sp08/6-pcl_comments_on_ab_32_proposed_scoping_plan.pdf)

Original File Name: PCL Comments on AB 32 Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-03 17:27:34

No Duplicates.

**Comment 6 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Julie Rynerson

Last Name: Rock

Email Address: Non-web submitted comment

Affiliation:

Subject: Land Use Services Department

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/7-julie\\_rock.pdf](http://www.arb.ca.gov/lists/ceqa-sp08/7-julie_rock.pdf)

Original File Name: Julie Rock.pdf

Date and Time Comment Was Submitted: 2008-12-05 08:45:14

No Duplicates.



**Comment 7 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Linda

Last Name: Krop

Email Address: LKrop@EDCnet.org

Affiliation: Environmental Defense Center

Subject: ARB Proposal re Significance Thresholds for GHGs under CEQA

Comment:

Please see attached comment letter.

Thank you,

Linda Krop

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/8-edc\\_comments\\_to\\_arb\\_re\\_ghg\\_and\\_ceqa\\_12-5-08.pdf](http://www.arb.ca.gov/lists/ceqa-sp08/8-edc_comments_to_arb_re_ghg_and_ceqa_12-5-08.pdf)

Original File Name: EDC comments to ARB re GHG and CEQA 12-5-08.pdf

Date and Time Comment Was Submitted: 2008-12-05 13:39:55

No Duplicates.

## **Comment 8 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Mary

Last Name: Vincent

Email Address: marybvincent@gmail.com

Affiliation:

Subject: Animal Agriculture Causes More Greenhouse Gases Than Transportation. (per United Nations)

Comment:

The United Nations Climate Change Report from November 2006 states that Animal Agriculture causes more greenhouse gases than transportation. The United Nations Url is below.  
<http://www.fao.org/newsroom/en/news/2006/1000448/index.html>

It is highly important that a significant reduction in animal agriculture be made to significantly reduce Green House Gases.

A transition to plant-based eating needs to take place which will also result in less water being used in California as well has reductions in heart disease, diabetes and childhood obesity.

I urge you to include the reduction of animal agriculture into the AB32 Plans and Goals.

Thank you.  
Mary Vincent  
Newark, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 06:55:48

No Duplicates.

**Comment 9 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Lynn

Last Name: Axelrod

Email Address: lynnl@rri.org

Affiliation:

Subject: No Project Alternative Inadequate

Comment:

Please accept the following attached comment. Thank you.

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/10-ab32ceqa.doc](http://www.arb.ca.gov/lists/ceqa-sp08/10-ab32ceqa.doc)

Original File Name: AB32CEQA.doc

Date and Time Comment Was Submitted: 2008-12-10 09:20:55

No Duplicates.

**Comment 10 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Brian

Last Name: Morris

Email Address: brianmorris@countyofplumas.com

Affiliation: County of Plumas

Subject: CEQA-FED Comments

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/11-ceqa\\_ab32\\_comments.pdf](http://www.arb.ca.gov/lists/ceqa-sp08/11-ceqa_ab32_comments.pdf)

Original File Name: CEQA AB32 Comments.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:26:01

No Duplicates.

**Comment 11 for CEQA (ceqa-sp08) - 45 Day.**

First Name: Jesse N.

Last Name: Marquez

Email Address: jnmarquez@prodigy.net

Affiliation: Coalition For A Safe Environment

Subject: AB 32 Scoping Plan & Appendix J Public Comments

Comment:

Dear Chairman Nichols & Members of the Board:

The Coalition For A Safe Environment (CFASE) wishes to submit these public comments requesting that the California Air Resources Board (CARB) not approve and adopt the proposed the AB 32 California Global Warming Solutions Act of 2006 Scoping Plan and Appendix J CEQA Functional Equivalent Document.

See attached public comment letter.

Attachment: [www.arb.ca.gov/lists/ceqa-sp08/12-cfase\\_carb\\_ab\\_32\\_scoping\\_plan\\_public\\_comments\\_\\_12-10-08.doc](http://www.arb.ca.gov/lists/ceqa-sp08/12-cfase_carb_ab_32_scoping_plan_public_comments__12-10-08.doc)

Original File Name: CFASE CARB AB 32 Scoping Plan Public Comments 12-10-08.doc

Date and Time Comment Was Submitted: 2008-12-10 11:25:33

No Duplicates.

**There are no comments posted to CEQA (ceqa-sp08) that were presented during the Board Hearing at this time.**