

## **Comment 1 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom  
Last Name: Lopinski  
Email Address: thelopinskis@aol.com  
Affiliation:

Subject: Lowering Gasoline Use and Emissions  
Comment:

Hello,

I read the article in the LA Times today about your proposal for lowering emissions, which I am full heartedly in support of. I've thought of another way to lower these emissions and save hundreds of thousands of gallons of gas for automobiles in California without adding more regulations or incurring too much extra costs.

Have you ever noticed how people approach a stop light? They either race up and try to beat the yellow light or try to slow down just enough to catch the green light before coming to a stop. Some people, of course, speed from one light to another and stop burning up precious fuel.

What if every stop light had a digital timer installed on top of the lights that could be seen hundreds of yards away that indicated how much time was left before the light changed? That way people could adjust their driving habits (and save gas) by slowing down or speeding up in order to catch a green light. You could also install cameras to keep the speeders from racing to beat a red light.

Studies have shown that this would increase fuel efficiency by at least 5-10% (probably more). We need to train people to be 'smarter' drivers and break the bad habits most have now of racing from one light to another. This measure, over time, would do that.

Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-16 14:22:31

No Duplicates.

## **Comment 2 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: David

Last Name: Craft

Email Address: dcraft@mbuapcd.org

Affiliation: MBUAPCD

Subject: Shipping CO2 emissions reductions

Comment:

Current technology exists to reduce the ship engine CO2 emissions by the equivalent of 10-35% using giant kites. This technology is offered by the European company SkySails.

<http://www.skysails.info/index.php?id=472&L=2>

"Currently, SkySails is offering towing kite propulsion systems for cargo vessels with an effective load of between 8 and 32 tons. The planned product program comprises towing kite propulsion systems with an effective load of up to 130 tons."

A California based company, not as far along in developing this technology, is Kite Ship.

<http://www.kiteship.com/news.php>

Shipping companies investing in this technology are able to see a positive rate of return on their investment.

A GHG control measure should be developed that requires large ships entering California ports to have used this technology in their travels here. The CO2 emissions reductions could be very large even if the emission reductions are only 10%.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-16 14:49:25

No Duplicates.

### **Comment 3 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anthony  
Last Name: Wexler  
Email Address: aswexler@ucdavis.edu  
Affiliation: UC Davis

Subject: Scoping Plan: Tracking and Measuring Progress  
Comment:

I recently attended the Bay Area Council Energy Committee meeting as UC Davis's representative where Bob Fletcher presented the proposed low carbon fuel standard in the Scoping Plan and Theresa Cho (CPUC) presented their Building Energy Efficiency Plan. These and other advances are very exciting -- as usual, the state is leading the country.

In reading the scoping plan, my attention was drawn to section D on page 107, Tracking and Measuring Progress. A key portion of the Plan is understanding if we really are improving by performing atmospheric measurements and so the Plan reads "Continuous atmospheric monitoring of greenhouse gases may also be useful for determining the effectiveness of emissions reduction strategies and for future inventory development."

This phrase "... may also be useful ..." weakens the statement unnecessarily. As we know from long experience developing emissions inventories for compounds such as NOx and VOCs related to smog production, these inventories are highly uncertain. We know this from atmospheric measurements and modeling. If we do not measure greenhouse gas concentrations in the atmosphere, we will not have any checks on the greenhouse gas emissions inventories leaving the uncertainties unexplored.

By measuring greenhouse gases and a range of co-pollutants, we cannot only verify the GHG emissions inventory, but also associate shortcomings in the inventory with emissions sources because processes that emit greenhouse gases also emit other compounds and particles that identify the sources.

Obviously, this is way too much detail for the scoping plan. The point of this comment is to encourage that this portion of the plan be strengthened. I suggest that the wording be changed to "Continuous atmospheric monitoring of greenhouse gases is essential for determining the effectiveness of emissions reduction strategies and for future inventory development."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-17 08:47:54

No Duplicates.

**Comment 4 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael

Last Name: Peevey

Email Address: eeg@cpuc.ca.gov

Affiliation: CA Public Utilities Commission

Subject: Response to questions regarding appropriateness of electric sector cap and trade

Comment:

The attached letter is in response to questions presented by Assemblymember Dave Jones in comments he submitted to CARB regarding electric sector cap and trade.

Attachment: [www.arb.ca.gov/lists/scopingpln08/5-jones\\_dave\\_sep\\_16\\_2008\\_cap\\_n\\_trade\\_in\\_cal\\_mjd.pdf](http://www.arb.ca.gov/lists/scopingpln08/5-jones_dave_sep_16_2008_cap_n_trade_in_cal_mjd.pdf)

Original File Name: JONES Dave\_Sep 16 2008\_Cap n Trade in Cal\_mjd.pdf

Date and Time Comment Was Submitted: 2008-10-20 17:46:30

No Duplicates.

## **Comment 5 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Margaret  
Last Name: Tollner  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Feebates in the Scoping Plan for AB 32  
Comment:

Oct 21, 2008

California Air Resource Board Members

Dear Members,

I support the inclusion of a Clean Car Discount program---also known as a "feebates" program---in the Scoping Plan for AB 32, the Global Warming Solutions Act of 2006. Studies show that a well-designed feebates program could reduce emissions from California cars and trucks by an additional 30 percent beyond the expected reductions from California's global warming pollution regulations for vehicles. The self-financing program provides one-time rebates and surcharges on the purchase of new cars and trucks based on each vehicle's level of global warming pollution, helping to make clean cars and trucks more affordable for all Californians.

Approximately 1.7 million new passenger cars and light-duty trucks are purchased each year in California. Even with existing laws and regulations, the bulk of global warming emissions in California continue to come from passenger vehicles.

The California Clean Car Discount is an urgently needed part of California's ground-breaking package of global warming solutions. I urge you to include a feebates program in the Scoping Plan for AB 32.

Sincerely,

Ms. Margaret Tollner  
4138 Marwick Ave  
Lakewood, CA 90713-3032

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-22 13:00:45

No Duplicates.

## **Comment 6 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Peter

Last Name: Wilson

Email Address: psfw\_66@roadrunner.com

Affiliation:

Subject: Cost-benefit analysis

Comment:

To say that AB 32 implementation will increase net employment and income is to make an economic prophesy that may, or may not, come true, regardless of the complexity of your economic modeling. To properly evaluate these regulations you must conduct a cost-benefit analysis. And the jobs and investment you foresee are properly categorized as a COST, not a BENEFIT, of implementation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-22 13:06:33

No Duplicates.



**Comment 7 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: D.

Last Name: Dustin

Email Address: Non-web submitted comment

Affiliation:

Subject: Re: Keep the AB 32 Scoping Plan Strong

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/8-dustin0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/8-dustin0001.pdf)

Original File Name: dustin0001.pdf

Date and Time Comment Was Submitted: 2008-10-22 13:07:12

No Duplicates.

**Comment 8 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jon  
Last Name: Van Bogart  
Email Address: jvb@cleanfuelusa.com  
Affiliation:

Subject: AB 32  
Comment:

Please see the attached file

Attachment: [www.arb.ca.gov/lists/scopingpln08/9-perc\\_ghg\\_full\\_report.pdf](http://www.arb.ca.gov/lists/scopingpln08/9-perc_ghg_full_report.pdf)

Original File Name: PERC GHG Full Report.pdf

Date and Time Comment Was Submitted: 2008-10-27 14:58:39

No Duplicates.

**Comment 9 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: W.R.

Last Name: Overman

Email Address: Non-web submitted comment

Affiliation:

Subject: Country of Siskiyou- Board of Supervisors

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/11-siskiyou0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/11-siskiyou0001.pdf)

Original File Name: siskiyou0001.pdf

Date and Time Comment Was Submitted: 2008-10-28 16:31:45

No Duplicates.

**Comment 10 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Pamela

Last Name: Knorr

Email Address: Non-web submitted comment

Affiliation:

Subject: County of Alpine- County Administrative Office

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/12-alpine0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/12-alpine0001.pdf)

Original File Name: alpine0001.pdf

Date and Time Comment Was Submitted: 2008-10-28 16:36:38

No Duplicates.

**Comment 11 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Pamela

Last Name: Torliatt

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Pentaluma

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/13-pentaluma0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/13-pentaluma0001.pdf)

Original File Name: pentaluma0001.pdf

Date and Time Comment Was Submitted: 2008-10-28 16:42:33

No Duplicates.

**Comment 12 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Reginald

Last Name: Burgess

Email Address: Non-web submitted comment

Affiliation:

Subject: Reginald Burgess, CEO Hydrogenpowercentral.com

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/14-reginald0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/14-reginald0001.pdf)

Original File Name: reginald0001.pdf

Date and Time Comment Was Submitted: 2008-10-28 16:50:35

No Duplicates.

**Comment 13 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Julia

Last Name: Cato

Email Address: Non-web submitted comment

Affiliation:

Subject: Julia A. Cato

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/15-jcato0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/15-jcato0001.pdf)

Original File Name: jcato0001.pdf

Date and Time Comment Was Submitted: 2008-10-28 16:53:42

No Duplicates.

**Comment 14 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lisa

Last Name: Rivas

Email Address: Non-web submitted comment

Affiliation:

Subject: Regional Legislative Alliance

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/16-regional0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/16-regional0001.pdf)

Original File Name: regional0001.pdf

Date and Time Comment Was Submitted: 2008-10-28 17:03:55

No Duplicates.



**Comment 15 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Diane

Last Name: Dillon

Email Address: Non-web submitted comment

Affiliation:

Subject: Napa County California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/17-napa0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/17-napa0001.pdf)

Original File Name: napa0001.pdf

Date and Time Comment Was Submitted: 2008-10-28 17:04:53

No Duplicates.

**Comment 16 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Irene

Last Name: Farlee

Email Address: Non-web submitted comment

Affiliation:

Subject: Form Letter 1- CitizenLetter

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/18-scoping0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/18-scoping0001.pdf)

Original File Name: scoping0001.pdf

Date and Time Comment Was Submitted: 2008-10-29 11:16:20

1500 Duplicates.

**Comment 17 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Paul  
Last Name: Bernstein  
Email Address: pbernstein@crai.com  
Affiliation: CRA International

Subject: Economic Analysis Supplement to the Draft Scoping Plan  
Comment:

Dear ARB,

Please see our attached comments on the Economic Analysis Supplement to the Draft Scoping Plan. Thank you for considering our concerns.

Regards,  
Paul Bernstein

Attachment: [www.arb.ca.gov/lists/scopingpln08/20-eas\\_comments\\_crai.pdf](http://www.arb.ca.gov/lists/scopingpln08/20-eas_comments_crai.pdf)

Original File Name: EAS\_Comments\_CRAI.pdf

Date and Time Comment Was Submitted: 2008-10-30 10:35:00

No Duplicates.

**Comment 18 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: William

Last Name: Molinari

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Montebello

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/21-montebello0002.pdf](http://www.arb.ca.gov/lists/scopingpln08/21-montebello0002.pdf)

Original File Name: montebello0002.pdf

Date and Time Comment Was Submitted: 2008-10-30 10:49:37

No Duplicates.

**Comment 19 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom

Last Name: Canning

Email Address: Non-web submitted comment

Affiliation:

Subject: "Feebates" Program

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/22-scoping0002.pdf](http://www.arb.ca.gov/lists/scopingpln08/22-scoping0002.pdf)

Original File Name: scoping0002.pdf

Date and Time Comment Was Submitted: 2008-10-30 11:01:09

No Duplicates.

**Comment 20 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Elizabeth

Last Name: Gavric

Email Address: elizabethg@car.org

Affiliation: California Association of REALTORS

Subject: California Association of REALTORS Comments on Proposed Scoping Plan  
Comment:

Please disregard the earlier post and see the attached document for comments from the California Association of REALTORS on the Proposed Scoping Plan.

Thank you,

Elizabeth Gavric

Attachment: [www.arb.ca.gov/lists/scopingpln08/24-arb\\_arb\\_proposed\\_scoping\\_plan\\_-\\_car\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/24-arb_arb_proposed_scoping_plan_-_car_comments.pdf)

Original File Name: ARB ARB Proposed Scoping Plan - CAR Comments.pdf

Date and Time Comment Was Submitted: 2008-10-30 15:24:33

No Duplicates.

**Comment 21 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Reginald

Last Name: Burgess

Email Address: Non-web submitted comment

Affiliation:

Subject: Hydrogenpowercentral.com

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/25-reginald0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/25-reginald0001.pdf)

Original File Name: reginald0001.pdf

Date and Time Comment Was Submitted: 2008-10-31 09:32:23

No Duplicates.

## **Comment 22 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: shawn  
Last Name: johnson  
Email Address: shawn\_jones@hurley.com  
Affiliation:

Subject: Scoping Plan  
Comment:

Dear CARB, please consider:

The Scoping Plan should use 2 strong and efficient measures: Feeding Tariffs (FiTs) and Carbon Fees. More than 37 countries already use FiTs, which require utility companies to pay a fixed price to anyone generating renewable electricity. This fixed price gives renewable energy generators return on costs plus a fair profit. Carbon Fees establish a fixed price per ton of carbon dioxide emissions.

And regarding the Carbon Pollution Trading Program, any program set up in California should auction pollution allowances. Auction revenues should then go towards developing clean energy technology and other public benefits.

thanks for your consideration,

Shawn Johnson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-01 09:57:58

No Duplicates.



**Comment 23 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Steven

Last Name: Grimes

Email Address: stevenlgrimes@sbcglobal.net

Affiliation:

Subject: Hydrogen co-generation nuclear power plants

Comment:

Is the Board aware of any efforts to explore the possibility of producing hydrogen using High Temperature Gas Reactors? No doubt more study or a research facility would be required. Would Californians be willing to explore increased use of nuclear power in exchange for cleaner air?

Attachment: [www.arb.ca.gov/lists/scopingpln08/27-hybrid\\_process.pdf](http://www.arb.ca.gov/lists/scopingpln08/27-hybrid_process.pdf)

Original File Name: hybrid\_process.pdf

Date and Time Comment Was Submitted: 2008-11-01 19:29:48

No Duplicates.

**Comment 24 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lynn  
Last Name: Axelrod  
Email Address: lynnl@rri.org  
Affiliation:

Subject: AB 32 Is Not Comprehensive on Water  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/28-ab32\\_water\\_notcomprehensive.doc](http://www.arb.ca.gov/lists/scopingpln08/28-ab32_water_notcomprehensive.doc)

Original File Name: AB32:Water:NotComprehensive.doc

Date and Time Comment Was Submitted: 2008-11-03 14:51:42

No Duplicates.

## **Comment 25 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: David

Last Name: Dichner

Email Address: ddichner@zss.com

Affiliation:

Subject: Strengthening the draft Scoping Plan

Comment:

The draft Scoping Plan should be strengthened in one or more of the following ways:

1. The recommendation that electricity providers get 33% of their energy from renewable sources by 2020 needs to be mandated by either legislation or regulation.
2. The 21% reductions in Greenhouse Gas emissions should be lowered and pollution allowances should be auctioned.
3. The Scoping Plan should use Feedin Tariffs and Carbon Fees.
4. The Scoping Plan should mandate many more electric vehicles.
5. The Scoping Plan must utilize "Community Choice" which lets cities and counties pool the buying power of all local electric customers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-04 10:24:08

No Duplicates.

**Comment 26 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dorothy

Last Name: Rothrock

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: AB 32 Implementation Group -- Comments on CARB Economic Analysis  
Comment:

Attached please find the AB 32 Implementation Group's comments on CARB's economic analysis for the AB 32 Scoping Plan.

If you have any trouble opening the zip file, please let me know.

Thanks for you help.

Shelly Sullivan

Attachment: [www.arb.ca.gov/lists/scopingpln08/32-letter\\_to\\_carb\\_econ\\_analysis.zip](http://www.arb.ca.gov/lists/scopingpln08/32-letter_to_carb_econ_analysis.zip)

Original File Name: Letter to CARB\_Econ Analysis.zip

Date and Time Comment Was Submitted: 2008-11-05 11:10:39

No Duplicates.

**Comment 27 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jeff

Last Name: Donovan

Email Address: Non-web submitted comment

Affiliation:

Subject: Support Union of Concerned Scientists

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/33-scoping0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/33-scoping0001.pdf)

Original File Name: scoping0001.pdf

Date and Time Comment Was Submitted: 2008-11-05 14:12:58

No Duplicates.

**Comment 28 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Elizabeth

Last Name: Patterson

Email Address: Non-web submitted comment

Affiliation:

Subject: The City of Benicia

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/34-scoping0003.pdf](http://www.arb.ca.gov/lists/scopingpln08/34-scoping0003.pdf)

Original File Name: scoping0003.pdf

Date and Time Comment Was Submitted: 2008-11-05 14:14:09

No Duplicates.

**Comment 29 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Joyce

Last Name: Walker

Email Address: Non-web submitted comment

Affiliation:

Subject: Form Letter 3- Comprehensive Cap and Dividend

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/37-formletter0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/37-formletter0001.pdf)

Original File Name: formletter0001.pdf

Date and Time Comment Was Submitted: 2008-11-06 15:05:02

34 Duplicates.

**Comment 30 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Hannah

Last Name: Borthwick

Email Address: Non-web submitted comment

Affiliation:

Subject: Climate Change Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/38-scop0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/38-scop0001.pdf)

Original File Name: scop0001.pdf

Date and Time Comment Was Submitted: 2008-11-06 16:16:49

No Duplicates.



**Comment 31 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tracey

Last Name: Drabant

Email Address: Non-web submitted comment

Affiliation:

Subject: Bear Valley Electric Service

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/39-scop0002.pdf](http://www.arb.ca.gov/lists/scopingpln08/39-scop0002.pdf)

Original File Name: scop0002.pdf

Date and Time Comment Was Submitted: 2008-11-06 16:18:26

No Duplicates.

**Comment 32 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Barry

Last Name: Vesser

Email Address: Non-web submitted comment

Affiliation:

Subject: Climate Protection Campaign

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/40-ca\\_global\\_warming\\_petition.zip](http://www.arb.ca.gov/lists/scopingpln08/40-ca_global_warming_petition.zip)

Original File Name: CA Global Warming Petition.zip

Date and Time Comment Was Submitted: 2008-11-06 16:49:43

No Duplicates.

**Comment 33 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ray

Last Name: Weiss

Email Address: rfweiss@ucsd.edu

Affiliation: Scripps Oceanography, UCSD

Subject: Scoping Plan: Tracking and Measuring Progress

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/43-weiss\\_psp\\_11-7-08\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/43-weiss_psp_11-7-08_comments.pdf)

Original File Name: Weiss\_PSP\_11-7-08\_Comments.pdf

Date and Time Comment Was Submitted: 2008-11-07 17:00:12

No Duplicates.

**Comment 34 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John  
Last Name: Helfrich  
Email Address: john@helfrichtool.com  
Affiliation:

Subject: AB 32  
Comment:

ARB Final Scoping Plan, there remain several points of serious concern to our company.

Attachment: [www.arb.ca.gov/lists/scopingpln08/45-ab32\\_calif\\_air\\_board.doc](http://www.arb.ca.gov/lists/scopingpln08/45-ab32_calif_air_board.doc)

Original File Name: AB32 Calif Air Board.doc

Date and Time Comment Was Submitted: 2008-11-10 09:02:32

No Duplicates.

## **Comment 35 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Pieter

Last Name: Tans

Email Address: Pieter.Tans@noaa.gov

Affiliation: NOAA Earth System Research Laboratory

Subject: Section IV D Tracking and Measuring Progress

Comment:

Section IV D of the proposed scoping plan can be improved in essential ways in my opinion. In the process of severely reducing emissions, enormous investments will be made by government, the private sector, and individual citizens. We need to know to what extent each of these policies or strategies is really successful as opposed to what is being claimed for them or desired. It would be foolish to rely primarily, as the current plan appears to do, on claimed reductions. These accounting practices are indeed necessary, but society needs independent verification, on the scale of counties and states, of the accounting in the place where it counts, namely the atmosphere itself. There is too much money at stake, nor can we afford the climate risk of mitigation measures being not as effective as we hope they are. I'll mention just two examples, out of many, pertaining to emissions inventories. There is overwhelming evidence from atmospheric measurements that the EPA overestimates U.S. emissions of carbon monoxide by a factor 2-3. There is also good evidence that they underestimate sulfur hexafluoride emissions (reported to the UN Framework Convention on Climate Change) by a factor of ~two.

What I would like to see CARB propose is a plan to combine GHG measurements with many other chemical species, many of which are already being measured, such as HCFCs, HFCs, CO, hydrocarbons, etc.

The observation of correlated variations in the atmosphere helps to apportion the variation of GHGs to specific processes, and simultaneously it allows for better quantification of the emissions of species contributing to air pollution. To be fully effective, all of these measurements need to be a part of, and embedded in, a larger framework. Air flows into, above, and out of California, contributing to information about emissions in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-10 09:09:10

No Duplicates.

**Comment 36 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dale

Last Name: Congelliere

Email Address: dale@crenshawdiemfg.com

Affiliation: Crenshw Die and Mfg.

Subject: RE: Concerns with AB32 Final Scoping Plan

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/scopingpln08/48-ab32\\_crenshaw.pdf](http://www.arb.ca.gov/lists/scopingpln08/48-ab32_crenshaw.pdf)

Original File Name: AB32 Crenshaw.pdf

Date and Time Comment Was Submitted: 2008-11-10 10:11:18

No Duplicates.

**Comment 37 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jeff  
Last Name: Mock  
Email Address: thorock1@aol.com  
Affiliation: California Metals Coalition

Subject: AB 32 Scoping Plan  
Comment:

On behalf of our employees, I encourage the staff to reconsider some of the provisions of the AB 32 Scoping proposals. Thank you.

Jeff Mock, Thorock Metals, Inc.

Attachment: [www.arb.ca.gov/lists/scopingpln08/49-ab32\\_review\\_request.doc](http://www.arb.ca.gov/lists/scopingpln08/49-ab32_review_request.doc)

Original File Name: AB32 Review Request.doc

Date and Time Comment Was Submitted: 2008-11-10 11:45:47

No Duplicates.

**Comment 38 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Angus  
Last Name: Crane  
Email Address: [acrane@naima.org](mailto:acrane@naima.org)  
Affiliation: NAIMA

Subject: NAIMA's Comments - CARB's "Climate Change Proposed Scoping Plan: A Framework For Change"

Comment:

November 10, 2008

Attached please find NAIMA's comments on the California Air Resources Board's "Climate Change Proposed Scoping Plan: A Framework For Change" (October 2008).

Please contact Angus Crane at 703/684-0084 if you have any questions.

Attachment: [www.arb.ca.gov/lists/scopingpln08/50-rac1865.doc](http://www.arb.ca.gov/lists/scopingpln08/50-rac1865.doc)

Original File Name: RAC1865.doc

Date and Time Comment Was Submitted: 2008-11-10 13:26:04

No Duplicates.



**Comment 39 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ken

Last Name: Johnson

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

Affiliation:

Subject: Sec. 38560

Comment:

Please see the attachment.

Attachment: [www.arb.ca.gov/lists/scopingpln08/51-ppsp\\_comments\\_kenjohnson.pdf](http://www.arb.ca.gov/lists/scopingpln08/51-ppsp_comments_kenjohnson.pdf)

Original File Name: PSP\_Comments\_KenJohnson.pdf

Date and Time Comment Was Submitted: 2008-11-10 16:07:50

No Duplicates.

## **Comment 40 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Rebecca

Last Name: Sutton

Email Address: becky@ewg.org

Affiliation: Environmental Working Group

Subject: AB32, environmental justice, and agriculture

Comment:

The Air Resources Board estimates that agriculture in California releases 6% of our global warming emissions. Research indicates that modifying our existing agricultural systems can transform agricultural lands from emissions sources to emissions sinks. Yet the Air Resources Board proposed scoping plan includes just 1 page of proposals relevant to agriculture, suggesting voluntary methane digestion facilities at large dairies, and describing an on-going research project on agricultural emissions of the global warming gas nitrous oxide.

The proposed scoping plan ignores many opportunities to use agricultural means to reduce global warming emissions, including measures that would directly benefit underprivileged communities in the inner city and farm workers. We ask that the Board evaluate fully the universe of global warming emissions reductions possible in the agricultural sector, with special attention to those measures that benefit disadvantaged communities. We recommend amending the proposed scoping plan to include measures and research in the following 3 areas:

### Urban agriculture

The Air Resources Board is actively encouraging urban forestry through approval of a methodology for quantifying voluntary reductions accrued by planting trees. The Board should outline a similar methodology associated with the creation of community gardens in urban areas. Community gardens can sequester carbon in the soil, and reduce the use of fuel to transport fresh produce to urban areas. Modeling a program after Oakland's Food Policy and Plan (Oakland City Council Resolution No. 79680) to require urban areas to source a percentage of their food locally would also dramatically decrease the number of food miles needed to transport food, thus decreasing fuel use and greenhouse gas emissions. Decreasing the size of inner city areas known as "food deserts," areas, in which the only food available is expensive, highly processed and packaged, or low quality would benefit minority, immigrant, and low-income communities. Environmental justice co-benefits include improved nutrition and health of the communities served, and creation of welcoming public spaces for local residents to enjoy.

### Organic agriculture

Decreased use of pesticides and synthetic fertilizers can reduce the significant energy inputs required to produce these chemicals, while simultaneously reducing harmful chemical exposures to farm workers. Agricultural research also indicates organic farms sequester more carbon within the soil, and may release similar

amounts of nitrous oxide. We recommend immediate implementation of a targeted research program to quantify the overall global warming footprint of organic versus conventional farm practices.

Agriculture within the cap and trade framework  
Agricultural offsets may be a useful means of reducing global warming emissions in California. If offsets become a major means by which capped sectors reduce emissions, however, the cap and trade system will fail to foster the technological innovations necessary to move California away from fossil fuels, and will allow continued exposures of fenceline communities near refineries and power plants to toxic air contaminants.

Review of the proposed scoping plan and related documents indicates that the Air Resources Board has not provided a comprehensive investigation of these and other opportunities to reduce global warming emissions through agriculture. As part of "an open public process," the Board should publish feasibility and cost evaluations of the measures described above.

We are pleased to have the opportunity to provide public comments for the Board's consideration. We ask that the Board amend the scoping plan to take full advantage of the additional opportunities to achieve greenhouse gas emission reductions through improvements in the environmental performance of agriculture. We also ask the Board to provide a clear and detailed account of the reasoning it uses to identify and evaluate measures to reduce global warming emissions in agriculture and all other sectors in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-11 09:23:11

No Duplicates.

**Comment 41 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Julee

Last Name: Malinowski-Ball

Email Address: julee@ppallc.com

Affiliation: Public Policy Advocates

Subject: Revised Comments from the California Biomass Energy Alliance

Comment:

I would like to recall the comments filed yesterday 11/10/08 by the California Biomass Energy Alliance and submit the attached comments date 11/11/08 in its place.

Attachment: [www.arb.ca.gov/lists/scopingpln08/53-carb\\_comments\\_on\\_proposed\\_ab-32\\_scoping\\_plan3\\_\\_2\\_.doc](http://www.arb.ca.gov/lists/scopingpln08/53-carb_comments_on_proposed_ab-32_scoping_plan3__2_.doc)

Original File Name: CARB comments on Proposed AB-32 Scoping Plan3 (2).doc

Date and Time Comment Was Submitted: 2008-11-11 10:01:38

No Duplicates.

**Comment 42 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Steven

Last Name: Brink

Email Address: [steveb@foresthealth.org](mailto:steveb@foresthealth.org)

Affiliation: California Forestry Association

Subject: AB 32 Scoping Plan to Reduce Greenhouse Gas Emissions in California

Comment:

Comments are in attached word document

Attachment: [www.arb.ca.gov/lists/scopingpln08/54-081103\\_cfa\\_response\\_to\\_arb\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/scopingpln08/54-081103_cfa_response_to_arb_scoping_plan.doc)

Original File Name: 081103\_CFA\_response\_to\_ARB\_Scoping\_Plan.doc

Date and Time Comment Was Submitted: 2008-11-11 14:05:58

No Duplicates.

## **Comment 43 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kenny  
Last Name: Zaucha  
Email Address: kenny@kenwalt.com  
Affiliation: None

Subject: AB32  
Comment:

Please see attached letter from me on behalf of my company. Thank  
You.

Attachment: [www.arb.ca.gov/lists/scopingpln08/55-ab32\\_letter\\_cal\\_air\\_resources\\_board\\_11-11-08.doc](http://www.arb.ca.gov/lists/scopingpln08/55-ab32_letter_cal_air_resources_board_11-11-08.doc)

Original File Name: AB32\_Letter\_Cal\_Air\_Resources\_Board 11-11-08.doc

Date and Time Comment Was Submitted: 2008-11-11 14:52:48

No Duplicates.

## **Comment 44 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Alicia

Last Name: Hancock

Email Address: aleeshk@hotmail.com

Affiliation:

Subject: Please auction off all emission credits and limit offsets

Comment:

California has a unique opportunity right now to set an example for the nation in how we collectively attack the problem of global warming. CARB should be commended for developing a Scoping Plan that is appropriately ambitious. But, I write to encourage CARB to make sure that the potential of this Plan is not destroyed by a failure to address the details.

Cap and trade can be an effective method of reducing emissions, but CARB's current Plan still does not specify how polluters will receive these credits. European countries provided emission credits for free to their industries, which contributed to the crumbling of their nascent cap-and-trade system. Please do not subject us to the same mistake. To provide the appropriate incentives (and disincentives), all of these emission credits should be auctioned. Not only will this contribute to faster adoption of clean technologies, but revenue from such an auction can be reinvested to create green jobs and aid low-income consumers and small businesses in reducing their energy bills. In addition, CARB should place greater immediate emphasis on other market mechanisms, such as feed-in tariffs and carbon fees.

It is disappointing to see that offsets are still playing a role in the Plan. Allowing offsets often encourages continued emissions in low-income neighborhoods and in defenseless habitats. It also weakens the demand for clean energy technology and green jobs in California. Any offsets allowed should at most represent only a small portion of a polluter's required emission reductions. To the extent that CARB retains offsets in the Plan, please include stringent protocols ensuring that the reductions are quantifiable, new, permanent, subject to independent third-party verification, enforceable by CARB, and only located in California.

CARB should be commended for including a 33% renewable electricity standard by 2020, but standards can become simply aspirational if they are not given the force of law. Please couple this standard with appropriate regulatory action. In addition, please make it easier and more affordable for California communities to meet and exceed this standard by promoting and enabling Community Choice Aggregation.

Thank you for all of your work in developing this Plan and in seeking public comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-12 07:54:49

No Duplicates.



**Comment 45 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kirk  
Last Name: Marckwald  
Email Address: Kirk@ceaconsulting.com  
Affiliation: Association of American Railroads

Subject: Railroad Industry Comments on Proposed Scoping Plan  
Comment:

Dear Mr. DuVall:

The members of the Association of American Railroads -- the Class I freight railroads operating in California and Pacific Harbor Lines (the Railroads) -- appreciate the opportunity to provide comments on ARB's AB 32 Proposed Scoping Plan (the Plan) released on October 15, 2008. Please see our comments in the enclosed document.

Regards,

Kirk Marckwald

Attachment: [www.arb.ca.gov/lists/scopingpln08/58-railroad\\_industry\\_comments\\_to\\_arb\\_proposed\\_scoping\\_plan\\_111208.pdf](http://www.arb.ca.gov/lists/scopingpln08/58-railroad_industry_comments_to_arb_proposed_scoping_plan_111208.pdf)

Original File Name: Railroad Industry Comments to ARB Proposed Scoping Plan 111208.pdf

Date and Time Comment Was Submitted: 2008-11-12 15:04:47

No Duplicates.

**Comment 46 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ed

Last Name: Pike

Email Address: ed@theicct.org

Affiliation: The ICCT

Subject: ICCT/E2 comments on proposed scoping plan & economic analysis

Comment:

Attached are comments from Dr. Alan Lloyd, President of the International Council on Clean Transportation, and Dr. Bob Epstein, co-founder of Environmental Entrepreneurs.

Attachment: [www.arb.ca.gov/lists/scopingpln08/59-scoping\\_plan\\_\\_econ\\_analysis\\_letter\\_final\\_11-12-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/59-scoping_plan__econ_analysis_letter_final_11-12-08.pdf)

Original File Name: scoping plan & econ analysis letter final 11-12-08.pdf

Date and Time Comment Was Submitted: 2008-11-12 16:31:20

No Duplicates.

## **Comment 47 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ron

Last Name: Silva

Email Address: rsilva@westartransport.com

Affiliation:

Subject: Westar Transport

Comment:

Dear ARB Board Members,

I operate a fleet of 150 Large Semi Trailers in California. The New Rule before you will have little impact in Reducing Green House Gases AND will drastically increase my cost of doing business in California. The Benefits assumed by Trailer Wings and Wide Tires are mostly unproven. Many statistics are at speeds above 55 Miles per Hour. The legal Truck Speed in California. I urge you to delay this rule until the Benefits can be proven in Real Life Trucking Operations. Like the ARB the Trucking Industry also wants Cleaner Air. How ever we cannot afford to bear the cost alone. Trailer Modification should be proven then applied to New Trailers only. The Cost of Retrofitting old trailers is prohibitive. We are currently in the worst economy seen in this country in 100 years. This is NOT THE TIME FOR ANY NEW RULES. You must consider giving the industry time to recover from the economy before you force more costs upon us. I suggest you put off any New Rules for 3 years and we all work together to expand Fleet and Trailer Modernization programs. This will clean the Air Faster and share the cost with all Californians. It should NOT be the Trucking Industries burden to provide all the finances to fix the Air in California. We bought our Trucks and Trailers in good faith, they were legal and compliant. Now the ARB is changing the Rules after we have made our investments. If this rule passes my trailer fleet worth over 3 million dollars will be all but worthless. This is no different than eliminating anyone's 401K plan. My personal wealth I have built over my life time will be eliminated with this rule. This NOT Fair. Like cars and Catalytic Converters we need to Phase in this new technology. I urge you NOT to Bankrupt a large percentage of the Trcucking Industry in California. We need more time to comply if we are going to stay in business. Thank for allowing me to submit these comments.

Ron Silva

CEO  
Westar Transport  
Selma, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 08:59:39

No Duplicates.

## **Comment 48 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Cara

Last Name: Eichorn

Email Address: Non-web submitted comment

Affiliation:

**Subject: Strengthen the Scoping Plan and Protect Public Health**

**Comment:**

Honorable Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Honorable Nichols,

The state is already experiencing up to 24,000 premature deaths from air pollution, 350,000 asthma attacks, thousands of hospitalizations and emergency room visits, and millions of missed school days from asthma and other respiratory symptoms. In addition, children in polluted areas of the state are growing up with reduced lung capacity due to pollution exposures that slow lung growth and development. Global warming will increase temperatures and emissions and lead to heat waves and weather conditions that accelerate smog formation, worsening these very serious health concerns.

In order to reach statewide goals for greenhouse gas reduction, the state plan must include the strongest possible measures to reduce emissions from the land use, transportation and industrial sectors. While the proposed state plan is a good start, stronger measures must be included. For example, the state must establish the strongest possible statewide target for greenhouse gas reduction from the land use sector. A stronger state target will spur local action to promote healthier communities, compact development patterns and alternative transportation choices to help reduce driving. Reducing global warming is a vital clean air strategy that will help Californians breathe easier and prevent suffering from lung and heart disease, and other illnesses. Please vote in favor of a STRONG, health protective, greenhouse gas reduction plan.

Sincerely,  
Cara Eichorn  
2402 North Lamer Street  
Burbank, CA 91504

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 09:11:52

220 Duplicates.

## **Comment 49 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: William

Last Name: Fraser

Email Address: bfraser@alumni.ucsd.edu

Affiliation:

Subject: Exact form of "carbon price"

Comment:

I am writing to convey my strong preference for a carbon tax over a cap-and-trade system. The main reasons for this preference are: Because any cap becomes not just a maximum, but also a minimum. Because, as the recent economic turmoil underscores, it is very hard to set the correct cap. Because any uncertainty in the future costs of permits could make it difficult to finance long-term carbon reduction projects.

In the event that a cap-and-trade system is used, I would like to express my preference for auctioning as large a percentage as is feasible, and doing so as soon as possible.

In the case that either a carbon tax or auctioned permits are in the plan, the vast majority of the proceeds should be rebated equally per capita to all California residents (with perhaps a 50% reduced share going to residents who are legal non-citizens).

Finally, in order to keep California business competitive, there should be a border tax adjustment.

Thank you for your time,

bill

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 10:20:37

No Duplicates.

## **Comment 50 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Christina  
Last Name: Smith  
Email Address: smichrl@yahoo.com  
Affiliation:

Subject: Global Warming Solutions Act  
Comment:

Dear CARB Board members:

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

I have a few requests that I believe will make this plan even stronger. I hope you will consider them during your meeting.

- 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.

- Please work to 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.

- Please increase the targets for local governments to reduce emissions caused by poorly planned growth that drives up vehicle miles travelled.

- Please require businesses to recycle their materials. We have a chance to make California even better as we address one of the worst crises our planet has ever faced. Strong CARB policies will help our state's residents realize some of the benefits we will receive by taking on global warming pollution: reduced air pollution, more clean-energy jobs, less waste and healthier communities.

Thanks again for your work on behalf of clean air for California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 10:26:09

368 Duplicates.



**Comment 51 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gregory  
Last Name: Doty  
Email Address: dotys4@cox.net  
Affiliation:

Subject: Our Planet First  
Comment:

It's time to stop the politics of greed and put our planet first.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 10:33:22

38 Duplicates.

## Comment 52 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Richard

Last Name: Harvey

Email Address: richard@infinitefunctions.com

Affiliation:

Subject: CARB Scoping Plan Comments

Comment:

CARB Board and Staff:

I congratulate CARB for issuing draft recommendations for implementing AB 32 that mandate clean energy standards, energy efficiency measures and clean vehicle requirements. Particularly, I was happy to see a 33-percent renewable energy requirement for the state's electricity supply.

However, CARB must go farther if we are going to make the major changes needed to prevent catastrophic changes to our climate. Please include in your Final Scoping Plan steps to:

- Make sure all polluters pay a price for greenhouse gas emissions through carbon fees or auctions. We can use those funds to create clean energy jobs and infrastructure for California.
- Reduce vehicle miles traveled (VMT) through performance-based public transportation programs, such as Bus to Transit connections.
- Speed production of zero-emission vehicles (ZEVs), by mandating hundreds of thousands of battery powered electric cars on our roads in the next decade.
- Adopt Zero-Waste policies built around life-cycle tracking of manufactured products and the "Three R's": Reduce waste, Reuse products, and Recycle solid waste materials and compost.
- Support California cities converting to clean energy using "Community Choice" programs that pool the buying power of local utility customers.
- Create "feed-in tariffs" requiring utility companies to pay a fixed, fair price for renewable electricity.
- Mandate more land-use & planning measures so that increasing vehicle use doesn't erode the gains from fuel efficiency and low-carbon fuels.
- Minimize "offsets" polluters use to claim they have reduced emissions & establish rigorous standards to hold them accountable for all greenhouse gases.

Thank you very much for all your hard work.

Sincerely, Richard Harvey

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 10:33:52

No Duplicates.

## **Comment 53 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sherry  
Last Name: Boschert  
Email Address: sherry.boschert@gmail.com  
Affiliation:

Subject: Strengthen AB32 Scoping Plan  
Comment:

The AB32 Scoping Plan is our big chance to get it right. Please don't be timid. Two main things need to be changed in the draft Scoping Plan to make it really work -- otherwise we'll do too little and create only the illusion that we're having any impact on climate change.

- 1) Change cap-and-trade to cap-and-auction. Make polluters pay for emission allowances, or we'll get nowhere.
- 2) Severely limit the use of offsets in the Plan. That's the only way we'll get change in practices.

While you're at it, stronger requirements for businesses to recycle and for better community planning would be good too, but without the two measures above, these won't be effective by themselves.

Thanks,

Sherry Boschert

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 10:38:04

No Duplicates.

## **Comment 54 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Barbara

Last Name: Epstein

Email Address: moccasinbarb@cox.net

Affiliation: Public Citizen, Educator, Sierra Club,

Subject: AB32 EMISSIONS

Comment:

CAP AND TRADE IS A RIDICULOUS IDEA. EITHER WE STOP POLLUTION OR WE DON'T. RESPONSIBLE BUSINESSES SHOULD BE DELIGHTED TO DO THEIR PART FOR THE IDEALS OF A HEALTHY WORLD.

THANKS ,

BARBARA EPSTEIN AND FAMILY,  
MEMBERS OF ALL MAJOR AND LOCAL ENVIRONMENTAL ORGANIZATIONS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 10:42:12

No Duplicates.

## **Comment 55 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Bill  
Last Name: Greninger  
Email Address: billgreninger@yahoo.com  
Affiliation:

Subject: AB 32 Scoping Plan to Reduce Greenhouse Gases  
Comment:

Dear CARB,

Your plan for dealing with global climate change over the next three decades, to be considered Novemebr 20, allows a large portion of pollution to come from a "cap-and-trade" system that will essentially allow polluters to trade permits for putting out greenhouse gases. In addition the proposal leaves open the chance the state will give away these emission allowances for free, even though the pollution they allow can hurt Californians.

Further, the proposed plan would allow polluters to meet half of these emissions caps by buying "offsets" - essentially buying their way out of complying with state law by paying others to reduce their global warming pollution. This would discourage development of clean energy technologies in California.

"Cap-and trade" should be replaced by a carbon tax on polluting industries. This would result in meaningful emission reductions and accelerate the pace toward renewable, pollution free energy.

"Offsets" could mean, for example, companies contracting with a foreign nation to maintain their forests while our companies continue to pollute. We might have little supervision over whether that country will honor its commitments. Again, this has the potential for a disingenuous "solution" to the problem of global climate change.

Sincerely,

Bill Greninger

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 12:52:03

No Duplicates.

**Comment 56 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gary

Last Name: Colbert

Email Address: cseghers@arb.ca.gov

Affiliation: Evergreen Oil, Inc.

Subject: Including Re-Refined Oil in State's Calculations for GHG reductions

Comment:

Please see attached comment.

Attachment: [www.arb.ca.gov/lists/scopingpln08/181-11\\_13\\_08\\_evergreenoil.pdf](http://www.arb.ca.gov/lists/scopingpln08/181-11_13_08_evergreenoil.pdf)

Original File Name: 11\_13\_08\_evergreenoil.pdf

Date and Time Comment Was Submitted: 2008-11-13 15:13:42

No Duplicates.

**Comment 57 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Rob

Last Name: Neenan

Email Address: cseghers@arb.ca.gov

Affiliation: California League of Food Processors

Subject: Economic Evaluation Supplement

Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/scopingpln08/183-11\\_06\\_08\\_clfp.pdf](http://www.arb.ca.gov/lists/scopingpln08/183-11_06_08_clfp.pdf)

Original File Name: 11\_06\_08\_clfp.pdf

Date and Time Comment Was Submitted: 2008-11-13 15:16:30

No Duplicates.



**Comment 58 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dan  
Last Name: Galpern  
Email Address: galpern@westernlaw.org  
Affiliation: Staff Attorney

Subject: Proposed Scoping Plan, AB 32 - Sec. 38560  
Comment:

In the attached, the Western Environmental Law Center submits comments aimed for consideration at the November and December ARB meetings with respect to the AB Scoping Plan. These comments are directed to the question whether the Plan fulfills the mandate under AB 32, Sec. 38560.

Dan Galpern, Staff Attorney  
Western Environmental Law Center

Attachment: [www.arb.ca.gov/lists/scopingpln08/194-welc\\_comments\\_on\\_proposed\\_rulemaking\\_-\\_20081113.pdf](http://www.arb.ca.gov/lists/scopingpln08/194-welc_comments_on_proposed_rulemaking_-_20081113.pdf)

Original File Name: WELC Comments on Proposed Rulemaking - 20081113.pdf

Date and Time Comment Was Submitted: 2008-11-13 16:48:43

No Duplicates.

## Comment 59 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: lianne

Last Name: dillon

Email Address: liannedillon@gmail.com

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

Graduate Student, San Diego State University

November 13, 2008

RE: Comments on Climate Change Proposed Scoping Plan

Dear Chair Nichols and Members of the California Air Resources Board:

We commend the California Air Resources Board (CARB) for its groundbreaking efforts to develop a comprehensive plan to reduce greenhouse gas emissions, and we are very pleased to see that the final version of the Scoping Plan is a significant improvement over the earlier draft.

We applaud the plan's greater emphasis on the role of land use planning and local government efforts in meeting the greenhouse gas reduction goals:

- The new plan more than doubles the goal for emission reductions from the land use sector (from just 2 million metric tons to 5).
- The plan also calls on local governments to reduce their emission by 15% over projected 2020 emission levels.

We also greatly appreciate the inclusion of the California Department of Public Health (CDPH) as the newest member of the Climate Action Team (CAT).

But before the Board adopts the final plan, we urge you to take the following actions to maximize the public health benefits of the Scoping Plan and protect vulnerable and low-income communities.

1. Establish a formal role for public health in the implementation of AB 32 regulatory and market strategies.

While CARB has tremendous expertise and knowledge about the air quality benefits of global warming strategies, there is a strong need for a broader range of information on health impacts and health benefits of mitigation strategies. It is important that the Scoping Plan include a clear commitment from the Board to reach out to the broad range of health constituencies.

We ask that you direct staff to come back within three months with recommendations for establishing a formal process to include state and local public health agencies and organizations in the development and review of all proposed greenhouse gas reduction measures, including proposed regulatory and market mechanisms, so that they can

provide input and analysis of the broad range of health benefits and concerns related to those measures.

2. Ensure protection for already over-impacted communities. Mitigation strategies, such as cap-and-trade programs or siting of new "green" facilities, must not exacerbate already existing health inequities in low-income communities. Such communities are already unequally burdened by extremely poor environmental conditions and poor health. This plan must include adequate safeguards for these communities. [ Insert specific information about your community and how it is already burdened by poor air quality. ] The Board must insure that each measure included in the Scoping Plan will not only assist statewide greenhouse gas reduction goals but will also improve conditions in local communities. This means that the measures must both prevent creation of localized pollution "hot spots" and demonstrate the ability to achieve real improvements in air quality and health conditions in all communities in the state.

2

We ask that you establish additional measures in the Scoping Plan to identify and ensure protection of vulnerable and low-income communities and prevent any backsliding on air quality protections. This includes directing CARB staff to do the following:

- a. Establish within one year a cumulative impacts screening protocol to identify those communities most impacted by air pollution;
- b. Design regulator and market-based compliance mechanisms to achieve maximum emission reductions and co-benefits in these communities; and
- c. Initiate a public process to determine how resources generated through implementation of AB 32 measures can be allocated to minimize adverse health impacts and create climate resiliency in our most vulnerable communities.

3. Set a higher target for greenhouse gas reductions from the land use sector.

The current target of 5 million metric tons (MMT) does not keep us on track for achieving our 2050 greenhouse gas reduction goals. We need to reduce vehicle miles traveled (VMT) by 10% by 2020, but the current 5 MMT target equates to only a 4% reduction in VMT. By assigning only minimal emission reduction targets to land use and transit policies, CARB misses a critical opportunity to spur meaningful change in the built environment to mitigate climate change and improve the public's health.

Requiring better land use and transportation planning will reduce greenhouse gas emissions, improve air quality and physical activity levels, and reduce obesity-related illnesses such as diabetes and cardiovascular disease. Twenty-five percent of all development on the ground in 2020 will have been built between 2010 and 2020. This presents a

tremendous opportunity to improve the design of new development so that it allows people to choose alternatives to driving and provide access to public transit. When transit is convenient and reliable people use it: 42% of Bay Area residents who live within ½ mile of public transit use it to get to work. When people live in compact, mixed-use communities they drive 30% less than those who live in sprawling suburban developments. CARB should increase the goal for emissions reductions due to smart land use planning to 11 - 14 MMT. This would send an important signal to create communities that enable people to get out of their cars and walk, bike, or take public transit—improving their own health while improving the health of the planet. Thank you for considering these suggestions. Sincerely,  
Lianne Dillon  
Masters of Public Health Graduate Student, San Diego State University

Attachment: [www.arb.ca.gov/lists/scopingpln08/204-comment\\_letter\\_on\\_carb\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/204-comment_letter_on_carb_proposed_scoping_plan.pdf)

Original File Name: Comment Letter on CARB Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-11-13 17:31:15

No Duplicates.

## **Comment 60 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Phil

Last Name: Graf

Email Address: editor@comcast.net

Affiliation:

Subject: Cap & Trade is a Rip-off

Comment:

The proposals for cap & trade are skewed to favor brokers and other insiders who stand to make fortunes on the flawed concepts of man-made global warming. Certainly, no one, not even industry wants pollution, which is why we have mechanisms in place to control it. However, even if we could eliminate 100% of man-produced global warming, the net result would be barely measurable in overall climate change, which is a natural phenomenon, unrelated to man's activities.

In short, please stop trying to play God, and please stop coming up with schemes which benefit the few, at the expense of the many.

Thank you. Remember, government is not the solution to the problem, you in government ARE the problem!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 18:03:34

No Duplicates.

## **Comment 61 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jonathan

Last Name: Baty

Email Address: founder@bikecommuter.com

Affiliation:

Subject: AB 32 Scoping plan to reduce GHG emissions in CA

Comment:

California should develop enforceable urban growth boundaries so that the continuous creep of sprawl development is stopped. No build zones should be developed in disaster prone hazard areas such as steep slopes, alluvial fans, wildfire prone regions, flood zones and seismic faults. No new residential development over 10 homes should be permitted that does not provide an equivalent number of long term jobs for the local community. Bedroom communities need to be transformed with corner grocery markets and cafes so that people don't have to drive a 2000 lb vehicle for a litre of juice.

Agricultural land should be preserved for both its carbon sequestration abilities as well as its ability to provide local food sources. Refocus efforts on sustainable regional economies producing high quality durable goods instead of cheap, pollution laden, disposable imports flooding our markets. Promote mixed use transit oriented development which connects to local recreational open spaces should be incentivised.

Create schools that are within walking and cycling distance of the students they serve. Davis has eliminated their school bus system because it is not necessary! Everyone walks and bikes to school just like we used to. Fund every Safe Routes to School funding request that comes in and get rid of 30% of morning congestion caused by parents driving their kids to school!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-13 21:21:00

No Duplicates.

**Comment 62 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anonymous  
Last Name: Advocate for Factual  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: National Average Temperatures Declining  
Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/scopingpln08/240-11\\_10\\_08\\_advocatefactualseience.pdf](http://www.arb.ca.gov/lists/scopingpln08/240-11_10_08_advocatefactualseience.pdf)

Original File Name: 11\_10\_08\_advocatefactualseience.pdf

Date and Time Comment Was Submitted: 2008-11-14 08:33:45

No Duplicates.

## Comment 63 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Thera Jane  
Last Name: Mercer  
Email Address: z1tj@juno.com  
Affiliation:

Subject: Clean Air, Clean California  
Comment:

Dear CARB Board Members,

Thank you for all your hard work for Californians and towards implementing the Global Warming Solutions Act.

I have a personal story to relate. Yesterday, I helped in a local action on behalf of Forest Ethics and the Long Beach chapter of the Sierra Club. I decided to take the bus to downtown Long Beach, saving fuel and money for parking. While waiting for the bus on busy Bellflower Avenue, I became overcome from the fumes of the passing cars. I literally had to cover my nose with my vest to breathe appropriately. By the way, our action handed out fortune cookies to the attendees with a message regarding a company in the convention that clear cuts California forests and our hope that they would not buy any products from that company. Such medieval procedures continues to threaten our air.

So, I have a few suggestions for you regarding the Global Warming Solutions Act:

1. My first, is that if there are no drastic reductions to air pollution, or all pollution for that fact, the economy won't matter much. Without a viable environment, the economy will go down with us. So, auction off all emission allowances to provide money for cleaner technologies and green jobs.
2. Reduce GREATLY the role of offsets. We are just deluding ourselves with this strategy.
3. GREATLY INCREASE targets for local governments to reduce emissions. Everyone needs to help.
4. Require businesses to recycle all of their materials. We can no longer be a throw away society.
5. And lastly, I suggest you google David Suzuki and hear his message to Canada's round table (Oct. 30,08) on Global Warming. It is sobering and not at all encouraging, but with help from individuals who run organizations like you, who have the power to put the environment as number one, perhaps we all won't self implode.

Thank you for your time and efforts.

Sincerely,

Ms. Thera Jane Mercer



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-14 10:09:08

No Duplicates.

## **Comment 64 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Morgen  
Last Name: Marshall  
Email Address: mmarshall@rideshare.org  
Affiliation: SLO Regional Rideshare

Subject: Scoping Plan for AB32  
Comment:

California Air Resources Board:

I am writing in support of AB32, but also to encourage a more ambitious goal of 11-14 MMT and the integration of Safe Routes to School as a component of this goal. The Safe Routes to School Program should be specifically mentioned as a measure to achieve the 11-14 MMT in both infrastructure and non-infrastructure capacities. I would also like to encourage school siting and community centered schools. Instead of building mega schools that require long travel distances from students, I encourage you to include requirements that encourage smaller schools more centrally located within communities. This will not only promote walking and biking to school, but also increase vehicle safety and improve air quality.

Thank you for the consideration of my comments.

Sincerely,  
Morgen Marshall

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-14 11:03:31

No Duplicates.

**Comment 65 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Howard

Last Name: Strassner

Email Address: RUTHOW@DSLEXTREME.COM

Affiliation:

Subject: CA GLOBAL WARMING RESPONSE

Comment:

Cap and trade can only work if the cost to emit CO2 IS CONSTANTLY INCREASED UNTIL TOTAL EMISSIONS ARE REDUCED.

CARB SHOULD ALSO DEAL WITH CO2 FROM DRIVING. INCREASING THE GAS TAX UNTIL THE CO2 FROM DRIVING IS ON TRACK TO REASONABLE LEVELS WILL INDUCE US TO DRIVE LESS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-14 11:33:37

No Duplicates.

## **Comment 66 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: gerald

Last Name: cauthen

Email Address: cautn1@aol.com

Affiliation:

Subject: Implementing AB 32

Comment:

While my understanding of AB 32 is far from total, I do know that it constitutes a serious attempt to reduce GHG production in California. How CARB enforces AB 32 is therefore of critical importance to anyone who cares about the future of this state and the planet.

In the Bay Area, the regional transportation authority has declared that 87% of the \$222 billion it expects to receive in transportation funds over the next 25 years has already been allocated to "committed" projects, and that these projects, even those still in the planning stages, are not subject to change or reevaluation. Roughly \$100 of the \$222 billion is slated to be spent on new projects, at least \$60 billion of which would lead to increases rather than decreases in GHG production.

So the question becomes: how will CARB cope with an intransigent public agency that insists on conducting business as usual, regardless of the new environmental circumstances and the provisions of AB 32?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-14 12:00:02

No Duplicates.

**Comment 67 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Charles

Last Name: Alexander

Email Address: sushibar@excite.com

Affiliation:

Subject: Seven Scoping Plan Comments

Comment:

All comments are in the seven .rtf files compressed within the attached .zip file.

Attachment: [www.arb.ca.gov/lists/scopingpln08/258-scoping\\_plan\\_comments.zip](http://www.arb.ca.gov/lists/scopingpln08/258-scoping_plan_comments.zip)

Original File Name: Scoping Plan Comments.zip

Date and Time Comment Was Submitted: 2008-11-14 14:01:22

No Duplicates.

## **Comment 68 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Siebert

Email Address: eesolar@sbcglobal.net

Affiliation:

Subject: Zero Emission Vehicles

Comment:

The scoping plan for AB 32 seems to carry less of a feeling of urgency than did the bill itself 2+ years ago. In the meantime we have nearly a permanent fire season, the intensity of hurricanes is growing, glaciers continue to retreat, etc.

Overall the scoping plan seems to hit all the right "buttons" but sometimes it comes across as just listing the issues.

We need a much clearer and bolder stance on plug-in vehicles (especially hybrids). Regarding power generation the cap and trade system should not start off with free credits -- they tried that in Europe and are just now getting things straightened out.

At home generation of power (rooftop PV) should get greater effort on the part of the state. A running tally of PV-installed Watts should be maintained and counted toward present RPS goals and as a guide to improving those goals over time. On the other hand, carbon offsets are tenuous at best; certainly accounting problems arise for sites beyond California's borders.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-14 14:49:51

No Duplicates.

**Comment 69 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kyra

Last Name: Ross

Email Address: mmckelvey@cacities.org

Affiliation: League of California Cities

Subject: League of California Cities Comments on ARB's Proposed Scoping Plan  
Comment:

Please see the attached document.

Attachment: [www.arb.ca.gov/lists/scopingpln08/263-ab\\_32\\_scoping\\_plan\\_loc\\_comments\\_final\\_14nov08\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/263-ab_32_scoping_plan_loc_comments_final_14nov08__2_.pdf)

Original File Name: AB 32 Scoping Plan LOC Comments FINAL 14nov08 \_2\_.pdf

Date and Time Comment Was Submitted: 2008-11-14 15:01:48

No Duplicates.

## **Comment 70 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robin

Last Name: Dean

Email Address: rdean@partnershipph.org

Affiliation: Partnership for the Public's Health

Subject: AB32 Scoping Plan

Comment:

To whom it may concern:

In your efforts to implement a comprehensive AB32 Scoping Plan, I urge you to consider the following:

1. During plan development, consult with leaders of the California Convergence (see <http://www.californiaconvergence.org/>), whose goals to promote access to physical activity converge with climate change goals.
2. Consider requiring every community to establish a standard of the distance each child needs to walk to reach a safe place to play (parks, etc.) If we create greater access to parks closer to where people live, this will reduce driving time and emissions expended to get to these places, and increase access to physical activity.
3. To accomplish said standard (2 above), provide incentives to schools and cities/counties to enter into joint use agreements.
4. Repeat: Offer incentives for joint use agreements to expand opportunities for physical activity, especially when it comes to existing schools (not new schools to be built).

Thanks, Robin Dean

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-14 16:00:18

No Duplicates.



**Comment 71 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Shankar

Last Name: Prasad

Email Address: shankar@coalitionforcleanair.org

Affiliation: Coalition for Clean Air

Subject: Scoping Plan Comments - Cumulative Impacts & Community Benefits  
Comment:

Please distribute our comments letter to all the Board Members

Attachment: [www.arb.ca.gov/lists/scopingpln08/269-cca\\_scopingplancomments\\_with\\_signatures.pdf](http://www.arb.ca.gov/lists/scopingpln08/269-cca_scopingplancomments_with_signatures.pdf)

Original File Name: CCA\_ScopingPlanComments\_with\_Signatures.pdf

Date and Time Comment Was Submitted: 2008-11-14 16:08:49

No Duplicates.

## **Comment 72 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: sigrid  
Last Name: mclaughlin  
Email Address: sigrid@coincidence.net  
Affiliation:

Subject: your plan to stop global warming  
Comment:

The California Air Resources Board (CARB)  
On November 20, you will consider the elements of your plan to stop global warming.  
As it stands, the plan allows that more than one-fifth of the reductions can come from a "cap-and-trade" system which will let polluters trade permits for putting out greenhouse gases. The proposal leaves open the chance the state will give away these emission allowances for free, even though the pollution they allow can hurt Californians.

Furthermore, the proposed plan would also let polluters meet half of these emissions caps by buying "offsets" - that is they can buy their way out of complying with state law by paying others to reduce their global warming pollution. This could not only worsen air pollution in our most polluted communities, but would discourage development of clean energy technologies in California.

This is no way to achieve our goal to tackle the pollution that causes global warming. The laws must not allow any of the above loop holes and give all possible incentives to speedy development alternative sustainable energy sources (NO COAL< End of oil; no drilling)--as other developed countries are doing, eager to get the technology and the markets for their economy!!

sincerely,  
Sigrid mclaughlin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-14 22:21:40

No Duplicates.

## **Comment 73 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Arthur

Last Name: Boone

Email Address: arboone3@yahoo.com

Affiliation: Northern Calif Recycling Assn.

Subject: Recycling

Comment:

The existing recommendations to improve recycling with its large impact on industrial emissions (well known and well-documented lower energy use and costs to remake old materials into new materials and products than to use virgin resources) are seriously deficient. The CIWMB has had over three years to move on the zero waste high recycling goal given it by the CAT in September, 2005 and to date has produced only a contract with a consultant to study the costs and effects of commercial recycling. This is woefully inadequate. CARB must hold the CIWMB's feet to the fire to develop more timely and significant work. THERE IS NOTHING IN THE AB32 PLANS THAT WILL HELP RECYCLING; NOT A THING. ARBoone

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-15 07:35:46

No Duplicates.

## **Comment 74 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom

Last Name: Bernitt

Email Address: bernitt@aol.com

Affiliation: Duke Environmental Leadership Program

Subject: Global Warming Solutions Act

Comment:

Please consider the recommendations proposed by the Sierra Club. As an added incentive, the strengthening of GHG/CC laws in California will help promote an economic incentive for new and innovative green businesses in California. Look to Detroit for a model of how to look in the rear view mirror on the economy and thus what not to do. California has always been a leader and this opportunity is no different.

Thanks in advance,

Tom Bernitt

Duke Environmental Leadership Program

National University School of Business

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-15 08:21:56

No Duplicates.

## **Comment 75 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Nancy

Last Name: Macy

Email Address: nbbm@cruzio.com

Affiliation: Valley Women's Club of San Lorenzo Valle

Subject: Recycling and AB 32 Scoping Plan

Comment:

I am Director of Recycling for the Valley Women's Club of the San Lorenzo Valley, which has been operating recycling centers in the Coastal Mountains of Santa Cruz County for over thirty years. We are concerned that recycling has been discounted in the Scoping Plan.

Obviously, the emissions reductions associated with Measure RW-3 High Recycling/Zero Waste should definitely be counted toward the AB 32 goal in the October 2008 Proposed Scoping Plan (Plan). Specifically, footnote #43 in Table 20 on page 63, Section II.15 Recycling and Waste, states, "Reductions from RW-2 and RW-3 are not counted toward the AB 32 goal." This must be amended to include them. The goal of Zero Waste is a direct link to improved greenhouse gas reductions.

Furthermore, the Plan recommends no specific actions or policies to implement RW-3, again an untenable oversight. We urge CIWMB & CARB to take urgent action to ensure that the Plan is revised to count RW-3 emissions reductions towards the AB 32 goal, and to add specific actions and policies to achieve RW-3 reductions, including: mandatory commercial recycling; phase-out of diversion credit for green waste alternative daily cover; and adoption of Extended Producer Responsibility framework legislation.

This is a vital part of what AB32 is trying to achieve.

Sincerely,

Nancy B. Macy, Director of Recycling  
Valley Women's Club of the SLV  
PO Box 574 Ben Lomond, CA 95005  
831-338-1728

"Dedicated to community action, awareness and leadership in environmental, educational, social and political concerns which affect the health and welfare of the San Lorenzo Valley."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-15 10:21:07

No Duplicates.

## Comment 76 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Billy

Last Name: Newbery

Email Address: bnewbery@sbcglobal.net

Affiliation:

Subject: Law requiring movement of vehicles in street

Comment:

San Diego, CA has the following requirement in the Municipal Code.

. Subject: Revision to Parking Code - 86.23(G) SDMC

Please help in repealing or modifying the subject parking code.

This code reads as follows:

86.23 Use of Streets for Storage, Service or Sale of Vehicles or for Habitation.

Prohibited

(g) No person shall store or cause to be stored any vehicle upon any street. A vehicle shall be considered stored when it has been left standing on a street without having been moved more than one-tenth 1/10 of a mile within a seventy-two (72) consecutive hour period.

The requirement to unnecessarily move any vehicle at least every 72 hours is incompressible. particularly in view of the environmental pollutants exhausted when driving, the shortage of gasoline, the traffic congestion, and traffic safety. The code should be deleted or revised to a more reasonable time period (at least two weeks or more), or motor homes exempted.

In my particular case, I own a motor home which I park on the street (no other space available). The motor home is not being stored on the street. It is used on occasion for tailgating, towing boat to go fishing, long vacations (up to two months each year), short visits to the desert, beaches and Arizona, etc. The motorhome is also moved frequently to comply with the law. To move the vehicle, I must drive around a long block, a distance of approximately 0.6 miles, make 4 left turns and cross 2 streets, and then park it right back where it was! What has been gained? Nothing! But what has occurred - pollutants, from the exhaust, have been added to the atmosphere, rubber has been added to the streets, gasoline has been wasted (not to mention the wear and tear on a cold motor) and the vehicle movement has added to the traffic congestion and safety. When the vehicle is a motor home, the result of these occurrences is probably tripled. My motor home consumes about 1/12 of a gallon for that 0.6-mile trip around the block. Multiply this by a minimum of 121 moves per year, a significant amount of gas is wasted and a significant amount of pollutants is added to the already taxed atmosphere. If every vehicle in San Diego complied with the 72-hour standing or parking limit, our smog would be far worse than it is and we would have

more traffic congestion. On the contrary to this law, people not driving their vehicles, unnecessarily, should be AWARDED, NOT PENALIZED!

Bill Newbery

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-15 11:53:35

No Duplicates.



## **Comment 77 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stephen  
Last Name: Haase  
Email Address: smhaase@cox.net  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

Dear CARB Board Member:

Thank you for your consideration of my following comments to implement the Global Warming Solutions Act.

- Offsets are a critical component of the Plan. The immediate reduction of CO2 will provide global benefits. Limiting offsets could delay emissions reductions by limiting the incentive for innovation in the marketplace.

- Local government targets should be respectful of differences in land use patterns and transit opportunities throughout the State. Performance based targets provide local governments the flexibility to engage the private sector and new development in entrepreneurial solutions to achieve the reductions defined by AB 32.

- Require all existing residences and businesses to recycle. This will leverage the efforts made by new development with efforts from existing development built prior to current recycling and energy efficiency codes.

Only by all Californians sharing the responsibility of reducing green house gas emissions and setting an example for the nation and the world will our State-wide efforts truly result in global benefit.

Thanks again for your work on behalf of clean air for California.

Stephen M. Haase, AICP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-15 16:36:36

No Duplicates.

## **Comment 78 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sherman

Last Name: Lewis

Email Address: sherman@csuhayward.us

Affiliation: too many environmental groups

Subject: Climate Scoping Plan

Comment:

How do you put a price tag on environmental costs, and who pays it? A free emission allowance is not a price; it's a give away. An auction sets a price at no higher than what a buyer is willing to pay.

Ordinarily I'd like to see the income spent of GHG reduction programs and social equity, but in these times it makes sense to apply it to the state budget deficit, or to the Resources Agency and Cal EPA with a similar result.

Offsets are another problem; too many encourage continuing pollution of disadvantaged neighborhoods. The challenge is to limit and reduce offsets so as to stimulate optimal elasticities of response from clean energy industries and their jobs and benefit to the economy and environment. Done right, these benefits outweigh costs to old industries.

Local governments can meet higher targets than those you are setting. They (and the state) are still building subsidized new roads and subsidized parking structures.

Businesses should be required to recycle their materials where obviously possible, and incentives should encourage more recycling where it is not.

The economy, properly including the environment, will grow with climate protection.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-15 18:16:12

No Duplicates.

## **Comment 79 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mike  
Last Name: Sandler  
Email Address: mike@climateprotectioncampaign.org  
Affiliation: Climate Protection Campaign

Subject: Auction, Dividend, and Fees  
Comment:

Dear CARB,

Please see the attached comments on the Final AB32 Scoping Plan.  
In summary, we recommend:

- The State should auction 100% of permits under the cap. Polluters should pay for their emissions, not be given free permits that subsidize coal and prolong the transition to cleaner energy.
- The Scoping Plan should specify that all auction revenues will be used to provide a Dividend to compensate consumers. Given the state of the economy, helping consumers deal with fuel and electricity costs is the best use of auction revenues. More information on consumer compensation is available at [www.capanddividend.org](http://www.capanddividend.org) and [www.carbonshare.org](http://www.carbonshare.org).
- We support CARB's proposal for Carbon Fees on fossil fuel companies to help fund CARB's implementation of AB32. Carbon Fees can also provide funding sources for clean technologies, green jobs, energy efficiency programs, and more.

Sincerely,

Mike Sandler  
Carbon Share Program Manager  
Climate Protection Campaign

Attachment: [www.arb.ca.gov/lists/scopingpln08/388-cpcab32scopplncomment11-16-08.doc](http://www.arb.ca.gov/lists/scopingpln08/388-cpcab32scopplncomment11-16-08.doc)

Original File Name: CPCAB32ScopPlncomment11-16-08.doc

Date and Time Comment Was Submitted: 2008-11-16 15:04:17

No Duplicates.

## **Comment 80 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Glen  
Last Name: Scorgie  
Email Address: g-scorgie@bethel.edu  
Affiliation:

Subject: Global Warming Solutions Act  
Comment:

Dear CARB Board members:

Thank you for your efforts to date. I believe that this important effort will be enhanced if the following improvements are incorporated:

1. Eliminate emission allowances. Though well-intentioned, their existence only prolongs polluting behaviors and stalls bolder green innovations.
2. Develop stronger urban planning incentives to reduce suburban sprawl and the resultant long commutes for residents of these outlying areas
3. Require businesses and institutions to recycle, and then vigorously monitor their performances in a no-nonsense way

America can still be an innovative nation, leading the way into the next phase of healthy, sustainable global economic develop. It simply needs encouragement to move beyond the bankrupt rust-belt mentality that has no viable future. Let's reject every and all foot-dragging on this! Californians will respond sacrificially to a challenge that is presented to them in an honest and inspirational way.

Thanks again for all your work. We know you care, and for that you have our admiration.

Glen G. Scorgie, PhD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-16 19:25:27

No Duplicates.

## **Comment 81 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sandra  
Last Name: Trutt  
Email Address: s.trutt@verizon.net  
Affiliation:

Subject: Cap and Trade  
Comment:

Dear CARB,

What a wonderful job you have done on this Scoping Plan. It's well thought out and it gives me hope that it will have a great impact on the environment. Thank you for all your hard work.

The only troubling part of this plan is the Cap & Trade provision. It seems to me that this will increase the toxic load on the areas that already are heavily impacted by pollution because companies can trade their emissions from someone who is planting trees, has a greener business or is located in a cleaner environment.

Under the Executive Summary it is stated that "Creating targeted fees, including a public goods charge on water use, etc..." would be an effective part of the plan. That is an excellent idea. This leads directly to the question, Why not create a carbon fee? If raised rates on water will reduce use, so will a fee on carbon emitted by companies. I know it is probably less popular, but it would surely work. And there are no negative impacts on any one region. All impacts would be positive. Yes, a Carbon fee would hurt manufacturers and businesses, but they would change their behavior quickly in order to avoid paying the fee.

Please consider this information and do what is best for all parts of California.

Thank you for your consideration.  
Sandra Trutt, Los Angeles

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-16 20:15:08

No Duplicates.

## **Comment 82 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mark

Last Name: Davis

Email Address: mark.davis7@sbcglobal.net

Affiliation: Concerned Citizen

**Subject: Strengthen the Scoping Plan and Protect Public Health**

**Comment:**

Dear California Air Resources Board

Our state is already experiencing up to 24,000 premature deaths from air pollution, 350,000 asthma attacks, thousands of hospitalizations and emergency room visits, and millions of missed school days from asthma and other respiratory symptoms. In addition, children in polluted areas of the state are growing up with reduced lung capacity due to pollution exposures that slow lung growth and development. Global warming will increase temperatures and emissions and lead to heat waves and weather conditions that accelerate smog formation, worsening these very serious health concerns.

In order to reach statewide goals for greenhouse gas reduction, the state plan must include the strongest possible measures to reduce emissions from the land use, transportation and industrial sectors. While the proposed state plan is a good start, stronger measures must be included. For example, the state must establish the strongest possible statewide target for greenhouse gas reduction from the land use sector. A stronger state target will spur local action to promote healthier communities, compact development patterns and alternative transportation choices to help reduce driving. Reducing global warming is a vital clean air strategy that will help Californians breathe easier and prevent suffering from lung and heart disease, and other illnesses. Please vote in favor of a STRONG, health protective, greenhouse gas reduction plan.

Sincerely,

Mark Davis (A Very Concerned Citizen)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-16 21:38:33

107 Duplicates.

## **Comment 83 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Julia  
Last Name: Donoho  
Email Address: jdonoho@sbcglobal.net  
Affiliation:

Subject: Carbon Sequestration  
Comment:

Dear CARB board,

In regards to your scoping plan, I believe all efforts are important to reduce greenhouse gases and incentivize all forms of renewable energy. And, I believe your efforts should not be focused on the type of fuels used as much as the capture and management of emissions. I understand that the carbon sequestration industry is changing in leaps and bounds this year, and can have great impact on power plants reduction of pollution. With your focus on clean air, your plan should be focused on the result of energy production, not so much on the method. The ultimate solution to our problems involves a diversity of industries and opportunities. We should all work toward cleaner air together.

Julia Donoho

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 09:46:46

No Duplicates.

## **Comment 84 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Audrie

Last Name: Clark

Email Address: booker@sdcoe.k12.ca.us

Affiliation: Sierra Club

Subject: global warming plan

Comment:

You, (CARB), have almost approved your plan for dealing with global warming over the next three decades.

Unfortunately as written, the plan calls for more than one-fifth of the reductions to come from a "cap-and-trade" system that will let polluters trade permits for putting out greenhouse gases. The proposal leaves open the chance the state will give away these emission allowances for free, even though the pollution they allow can hurt Californians.

Further, the proposed plan would allow polluters to meet half of these emissions caps by buying "offsets" - essentially buying their way out of complying with state law by paying others to reduce their global warming pollution. This could not only worsen air pollution in our most polluted communities, but would discourage development of clean energy technologies in California.

Please do not approve this flawed plan. You can and you must make it better for all of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 09:54:15

No Duplicates.



## **Comment 85 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Alison

Last Name: Stauffer

Email Address: [astauffer@ka-pow.com](mailto:astauffer@ka-pow.com)

Affiliation:

Subject: comments on AB 32 Scoping Plan

Comment:

Upon review of the final Climate Change Scoping Plan put forth by the California Air Resources Board (CARB), we remain concerned that it does not adequately assess the impacts to small businesses. With a 7.7 percent unemployment rate and all-around tough economic times, we are worried that California's small businesses will be saddled with billions of dollars in required upfront investments necessary to implement AB 32. Small businesses often operate on very small profit margins and we do not have the luxury of waiting several years to see a return on our investments. The unique challenges and circumstances of California's small businesses need to be examined and evaluated in greater depth before CARB moves forward with the actions and guidelines in its proposed Scoping Plan.

The proposed Scoping Plan increases taxes, energy costs, fuel costs, vehicle costs and building costs, which will hurt small businesses that play a vital role in California's economy. While we are hopeful that the climate change initiative will create new jobs and increase revenue, we are concerned about the significant short-term impacts and the undetermined long-term costs indicated in the plan. Because the effects of the plan will not be uniform across all sectors, detailed analysis and understanding of the individualized costs and benefits to each sector or industry is critical.

There is not a straight correlation between who will pay the costs and who will receive the benefits under AB 32. The recent comments to CARB by Judson Jaffe and Jonathan Borck of the Analysis Group noted that "While all businesses will experience increased energy prices as a result of AB 32's implementation, the forecasted energy-efficiency improvements will be unevenly distributed and may occur even without AB 32's implementation. As a result, some businesses will inevitably experience a net increase in their energy costs and a reduction in their competitiveness as a result of AB 32."

Jaffe and Borck found that businesses must reduce their electricity and natural gas use by no less than 10 percent and 7 percent respectively in order to just break even and compensate for the increases in price that will come under AB 32. For the many businesses that can't achieve the efficiency changes quickly, they will be burdened with higher bills for gas and electricity that will place additional strain on their already tight budgets. As CARB acknowledges, small businesses "typically spend more on energy as a percentage of revenue compared to larger enterprises" - meaning the small business community will be disproportionately

hurt by these cost increases.

Unfortunately, the significant costs associated with the Scoping Plan have not drawn the appropriate level of attention from CARB thus far. We understand that CARB sees many benefits that will come with AB 32 implementation, and we look forward to experiencing many of those benefits as well. However, by glossing over the costs that will accompany the benefits, we are reducing the chances that California actually creates a successful climate change model.

Only with straightforward acknowledgment of the costs will California's experts and decision-makers be able to face the challenges head on and identify creative and workable solutions. California needs to create a climate change program that will be implemented effectively and replicated elsewhere, not one that will have to be abandoned when the state suffers too severely from cost impacts. Therefore, we recommend that CARB fully understands the cost impacts of the AB 32 implementation policies before approving the plans and moving forward. We believe that it is possible to reduce our greenhouse gas emissions without putting an unnecessary burden on small businesses and consumers.

We recognize that the Scoping Plan lays out the direction and steps of AB 32 implementation and is not itself the regulations with which small businesses must comply. As your agency begins the rulemaking and regulation process we hope that you will place the highest value on adopting the most cost effective measures to meet the goals of AB 32. We appreciate the steps CARB has taken to better educate small businesses about the Scoping Plan and understand the views of these vital economic engines. Also, we look forward to participating in this process and hope that we can work together to craft a plan that protects the environment while also promoting economic growth.

Thank you for your attention to this very important issue.

Sincerely,

John Kabateck  
National Federation of Independent Business - California

Mary Griffin  
National Association of Women Business Owners - Sacramento Valley  
Chapter

John Handley  
California Independent Grocers Association

Matt Sutton  
California Restaurant Association

Joel Fox  
Small Business Action Committee

Larry Dick  
Riddle Service Companies

Betty Jo Toccoli  
California Small Business Association

Joel Ayala

California Hispanic Chamber of Commerce

Attachment: [www.arb.ca.gov/lists/scopingpln08/412-small\\_biz\\_scoping\\_plan\\_comments\\_11-17.pdf](http://www.arb.ca.gov/lists/scopingpln08/412-small_biz_scoping_plan_comments_11-17.pdf)

Original File Name: Small Biz\_Scoping Plan comments\_11-17.pdf

Date and Time Comment Was Submitted: 2008-11-17 10:17:19

No Duplicates.

## **Comment 86 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Roberta

Last Name: Lawson

Email Address: roberta.lawson@cdph.ca.gov

Affiliation: CA Conference of Local Health Officers

Subject: CCLHO AB comments to revised scoping plan

Comment:

Please find attached letter from Dr. Ann Lindsay, President, California Conference of Local Health Officers, commenting on the Climate Change Proposed Scoping Plan. Thank you.

Roberta Lawson

CCLHO Executive Administrator

Attachment: [www.arb.ca.gov/lists/scopingpln08/414-cclho\\_arb\\_comments\\_to\\_revised\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/414-cclho_arb_comments_to_revised_scoping_plan.pdf)

Original File Name: CCLHO ARB comments to revised scoping plan.pdf

Date and Time Comment Was Submitted: 2008-11-17 10:27:07

No Duplicates.

## **Comment 87 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Charles

Last Name: Siegel

Email Address: preserve@preservenet.com

Affiliation:

Subject: Pass Strong Standards to Control GHG Emissions

Comment:

I urge the California Air Resources Board to adopt a strong plan to combat global warming in California and to set the standard for national and international action. I also urge the state air board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments. The plan should also include a strong goal and additional regulatory measures for reducing pollution from industrial sources such as petroleum refineries and cement manufacturing facilities.

Thank you for your consideration of my concerns to strengthen these key strategies in the AB 32 draft scoping plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 14:23:37

1 Duplicates.

## **Comment 88 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kathleen  
Last Name: Sullivan  
Email Address: ksullsal@cox.net  
Affiliation: Mother of kid with asthma

Subject: AB32 Scoping Plan comments  
Comment:

Dear CARB Board:

Thanks for the opportunity for public input at this crucial time in history. This is where we take a stand and declare that without a commitment to healthier environment nothing else much matters in the future.

Please adopt a strong global warming scoping plan for California to both slow global warming and reduce smog and other dangerous air pollutants that cause illness and death.

The evidence is clear that air pollution is linked with excess deaths, excess lung and heart disabilities, and is a great economic burden to our state. It is also clear that reducing global warming will reduce many of our air pollution problems.

I urge the California Air Resources Board to adopt a strong plan to combat global warming in California and to be the model for other states and indeed other nations. Please add a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments. The plan should also include a strong goal and additional regulatory measures for reducing pollution from industrial sources such as petroleum refineries and cement manufacturing facilities.

In addition, the plan must demonstrate that the variety of proposed measures will not only make rapid progress toward reducing greenhouse gases, but will also provide local benefits to vulnerable individuals and communities and assist with adaptation to the negative effects of global warming.

Thank you for your consideration of my concerns to strengthen these key strategies in the AB 32 draft scoping plan.

Sincerely,

Kathleen Sullivan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 16:05:17

No Duplicates.

## Comment 89 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Eric

Last Name: Grant

Email Address: blissfieldslim@yahoo.com

Affiliation:

Subject: Comments for California Air Resources Board

Comment:

- Big polluters should pay for all their emissions: 100% auction of emissions permits, no free giveaways.

- Consider cap-and-trade just a minor tool among market mechanisms. Other tools should be brought forward more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda.

- Make sure the 33-percent renewable electricity standard by 2020 is given the force of law, either through legislation or regulatory action.

- Promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reduction potential for cities and counties.

- Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins and electric cars) beyond CARB's currently too low projected levels.

- Greatly strengthen the too-modest land use and agricultural sections of Plan. The Plan greatly underestimates the significance of methane emissions, by using the 100-year global warming potential. Over a shorter time horizon, methane accounts for 17% to perhaps well over 30% of the state's GHGs, rather than the 5.7% in the 2004 inventory.

- Further increase requirements for zero waste and recycling, as well as Extended Producer Responsibility.

- Ensure that actions to reduce greenhouse gases also help, whenever possible, to clean up California 's unhealthy air.

- Limiting offsets will strengthen the demand for clean energy innovation, which in turn provides more good jobs for Californians.

- Any offsets allowed should at most represent only a small portion of a polluter's required emission reductions. They should have stringent protocols ensuring that the reductions are quantifiable, new, permanent, subject to independent third-party verification, enforceable by CARB, and only located in California

- Offsets from sinks, such as planting trees or avoiding tree



cut-downs, should not be allowed, since they are too difficult to measure and often under-perform.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 18:04:54

No Duplicates.

## **Comment 90 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gary

Last Name: Liss

Email Address: gary@garyliss.com

Affiliation: Gary Liss & Associates

Subject: Zero Waste and Scoping Plan

Comment:

The USEPA and many others have documented that eliminating waste and recycling more will have both a direct and significant indirect impact on reducing greenhouse gas emissions. As a result, the ARB should follow the lead of the CA Integrated Waste Management Board in adopting Zero Waste as one of its key goals of the October 2008 Proposed Scoping Plan.

Footnote #43 in Table 20 on page 63, Section II.15 Recycling and Waste, states, "Reductions from RW-2 and RW-3 are not counted toward the AB 32 goal." This is a serious error. Zero Waste is one of the most significant, quickest and most cost effective ways that local governments can contribute to addressing climate change.

The emissions reductions associated with High Recycling/Zero Waste should be counted toward the AB 32 goal in the Plan by amending the Plan to include Measure RW-3. The Plan should also recommend specific actions and policies to implement RW-3, including:

- mandatory commercial recycling;
- phase-out of diversion credit for green waste alternative daily cover;
- and adoption of Extended Producer Responsibility framework legislation.

Gary Liss

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 21:12:30

No Duplicates.

## **Comment 91 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Nancy  
Last Name: Power  
Email Address: nancyrpower@yahoo.com  
Affiliation: Sierra Club

Subject: cap and trade  
Comment:

Let's face it, the cap 'n trade won't have teeth unless ALL the credits are auctioned off. We need to make fossil fuel energy to cost more to discourage it, to make it less subsidized, and to make alternative energy sources more competitive while they are being developed.

We especially need to invest in solar energy, the best choice for the long run, and to harvest the low-hanging fruit of energy efficiency, especially when the efficiency pays for itself in the long run.

--Nancy Power

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 21:48:21

No Duplicates.

## **Comment 92 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: jainendra  
Last Name: sharma  
Email Address: jai@zerowastesolutions.com  
Affiliation:

**Subject: Zero Waste Measures Must Be Included in Scoping Plan**  
**Comment:**

The emissions reductions associated with Measure RW-3 High Recycling/Zero Waste should definitely be counted toward the AB 32 goal in the October 2008 Proposed Scoping Plan (Plan). Specifically, footnote #43 in Table 20 on page 63, Section II.15 Recycling and Waste, states, "Reductions from RW-2 and RW-3 are not counted toward the AB 32 goal." The Scoping Plan must be amended to include Measure RW-3. The goal of Zero Waste is a direct link to reduced greenhouse gas emissions.

Furthermore, the Plan recommends no specific actions or policies to implement RW-3, again an untenable oversight. We urge CIWMB & CARB to take urgent action to ensure that the Plan is revised to count RW-3 emissions reductions towards the AB 32 goal, and to add specific actions and policies to achieve RW-3 reductions, including: mandatory commercial recycling; phase-out of diversion credit for green waste alternative daily cover; and adoption of Extended Producer Responsibility framework legislation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 23:27:00

No Duplicates.

## **Comment 93 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Diane  
Last Name: Nygaard  
Email Address: dandd2@peoplepc.com  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

Dear CARB Board members:

I appreciate the hard work you have put into preparing this first plan to address California's greenhouse gas emissions.

Please consider the following additional changes as you refine the plan

- the number of offsets allowed seems way too high. Please reduce these as the result will likely end up being continuing air pollution in low-income neighborhoods

- the target for local governments should be higher so they aren't rewarded for poorly planned land use that increases miles traveled and makes it harder to use alternative transportation like walking and biking

- include more incentives for recycling- particularly for businesses to provide for recycling of the items that they have created.

Thank you for considering these comments- we will all benefit from making these changes.

Diane Nygaard  
Oceanside, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 23:43:28

No Duplicates.

## **Comment 94 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jay

Last Name: Jones

Email Address: jonesj@ulv.edu

Affiliation: University of La Verne

Subject: AB32

Comment:

Regardless of ones view of the validity of anthropogenic global warming, the steps for reducing carbon emissions are a must. From a national security standpoint and from a health standpoint we must wean ourselves from burning fixed fossil fuels. Thousands die annually from the effects of fossil fuel based pollution. Strict regulation may be painful but in the long run it is the only way to foster the changes we need to carry us through the middle of this century. How would our economy be if California had not relaxed the implementation of electric vehicles? How many lives would have been saved by now? How do board members live with the understanding that their rulings literally determine morbidity and mortality rates.

Please think about your legacy and make this bill as strong as it can be. There is so much more at stake than just greenhouse gases.

Thank you for your serious consideration. I would be delighted to discuss this at length with anyone who is interested.

Very best,

Jay Jones

Professor of Biology and Biochemistry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-17 23:44:36

No Duplicates.

**Comment 95 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Timothy

Last Name: Jasper

Email Address: lmayfield@applevalley.org

Affiliation:

Subject: Comments on Proposed Scoping Plan

Comment:

Please see the attached letter for the Town of Apple Valley's comments. Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/533-arb\\_scoping\\_letter.doc](http://www.arb.ca.gov/lists/scopingpln08/533-arb_scoping_letter.doc)

Original File Name: ARB Scoping Letter.doc

Date and Time Comment Was Submitted: 2008-11-18 07:46:35

No Duplicates.

## **Comment 96 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael

Last Name: Wonsidler

Email Address: mwonsidler@hotmail.com

Affiliation:

Subject: Zero Waste Measures Must Be Included in Scoping Plan

Comment:

The emissions reductions associated with Measure RW-3 High Recycling/Zero Waste should be counted toward the AB 32 goal in the October 2008 Proposed Scoping Plan (Plan). Specifically, footnote #43 in Table 20 on page 63, Section II.15 Recycling and Waste, states, "Reductions from RW-2 and RW-3 are not counted toward the AB 32 goal." The Scoping Plan must be amended to include Measure RW-3.

The goal of Zero Waste is a direct link to reduced greenhouse gas emissions. Furthermore, the Plan recommends no specific actions or policies to implement RW-3, again an untenable oversight. We urge CIWMB & CARB to take urgent action to ensure that the Plan is revised to count RW-3 emissions reductions towards the AB 32 goal, and to add specific actions and policies to achieve RW-3 reductions, including: mandatory commercial recycling; phase-out of diversion credit for green waste alternative daily cover; comprehensive strategy to remove methane-producing organic materials from landfill disposal; and adoption of Extended Producer Responsibility framework legislation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-18 09:22:13

No Duplicates.



**Comment 97 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sandor

Last Name: Lau

Email Address: sandor@cascadesierrasolutions.org

Affiliation: Cascade Sierra Solutions

Subject: AB32 Scoping Plan, Clean Air and Transport Incentive Program

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/scopingpln08/542-mary\\_nichols\\_ab32\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/542-mary_nichols_ab32_letter.pdf)

Original File Name: Mary Nichols AB32 letter.pdf

Date and Time Comment Was Submitted: 2008-11-18 10:18:19

No Duplicates.

**Comment 98 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Crystal

Last Name: Bergemann

Email Address: crystal.bergemann@equator.net

Affiliation: Equator, LLC

Subject: Equator, LCC Comments on Scoping Plan

Comment:

Please accept the attached letter as Equator, LLC's comments on the CARB draft scoping plan.

Sincerely,  
Crystal Bergemann  
Equator Policy Analyst

Attachment: [www.arb.ca.gov/lists/scopingpln08/543-carb\\_comment\\_letter\\_final.docx](http://www.arb.ca.gov/lists/scopingpln08/543-carb_comment_letter_final.docx)

Original File Name: CARB comment letter final.docx

Date and Time Comment Was Submitted: 2008-11-18 10:21:03

No Duplicates.

**Comment 99 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Rocky

Last Name: Rogers

Email Address: rocky.rogers@reedley.ca.gov

Affiliation: City of Reedley

Subject: Notes on Climate Change Proposed Scoping Plan

Comment:

See Attachment for notes

Attachment: [www.arb.ca.gov/lists/scopingpln08/545-climate\\_change\\_notes.doc](http://www.arb.ca.gov/lists/scopingpln08/545-climate_change_notes.doc)

Original File Name: Climate Change notes.doc

Date and Time Comment Was Submitted: 2008-11-18 10:39:31

No Duplicates.

## **Comment 100 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Julie

Last Name: Muir

Email Address: juliem@pssi.stanford.edu

Affiliation: President, CA Resource Recovery Assoc.

Subject: Omission of Zero Waste Emissions Reductions in AB 32 Scoping Plan  
Comment:

Margo Brown, Chair, CIWMB  
1001 I Street  
Sacramento, CA 95814

RE: Omission of Zero Waste Emissions Reductions in AB 32 Scoping Plan

Dear Chair Brown:

The California Resource Recovery Association (CRRRA) is a statewide non-profit trade group. CRRRA's more than 450 members represent all aspects of California's reduce-reuse-recycle-compost economy.

CRRRA is extremely disappointed that the emissions reductions associated with Measure RW-3 High Recycling/Zero Waste are not counted toward the AB 32 goal in the October 2008 Proposed Scoping Plan (Plan). Specifically, footnote #43 in Table 20 on page 63, Section II.15 Recycling and Waste, states, "Reductions from RW-2 and RW-3 are not counted toward the AB 32 goal." Furthermore, the Plan recommends no specific actions or policies to implement RW-3

Zero Waste/High Recycling was established as a "high-confidence" strategy with GHG reduction potential of 10 million tons CO2 equivalent by 2020 in the Climate Action Team's Strategies Underway In California That Reduce Greenhouse Gas Emissions. The linkage between CIWMB Strategic Directives and climate protection was discussed extensively at the February 13, 2007 Board meeting when CIWMB adopted its Strategic Directives. Thus, it is particularly disappointing that CIWMB has failed to ensure that the Plan includes any specific actions or policies supporting implementation of its own Strategic Directives No. 6.1 (Reducing organics to landfill), and No. 5.2 (Extended Producer Responsibility).

In its lead advisory capacity to the California Air Resources Board (CARB) for developing the Recycling and Waste Section of the Plan, CIWMB must ensure that the significant emissions reductions available through High Recycling/Zero Waste measures are counted, and that specific actions and policies are recommended.

CRRRA hereby petitions CIWMB to take urgent action to ensure that the Plan is revised to count RW-3 emissions reductions towards the AB 32 goal, and to add specific actions and policies to achieve RW-3 reductions, including: mandatory commercial recycling; phase-out of diversion credit for green waste alternative daily cover; and adoption of Extended Producer Responsibility framework legislation.

I would welcome the opportunity to meet with you and other Board members to discuss this matter.

Thank you for your consideration and action.

Sincerely,

Julie Muir, President

cc: CIWMB Board Members  
California Air Resources Board

Attachment: [www.arb.ca.gov/lists/scopingpln08/554-crra\\_letter\\_to\\_ciwmb\\_re\\_scoping\\_plan\\_11-18-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/554-crra_letter_to_ciwmb_re_scoping_plan_11-18-08.pdf)

Original File Name: CRRA letter to CIWMB re Scoping Plan 11-18-08.pdf

Date and Time Comment Was Submitted: 2008-11-18 13:20:55

No Duplicates.

**Comment 101 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Deb

Last Name: Hubsmith

Email Address: brooke@saferoutespartnership.org

Affiliation: SRTS National Partnership

Subject: Comments on AB32 from Safe Routes to School National Partnership

Comment:

The Safe Routes to School National Partnership is pleased to have the opportunity to submit comments on the California Air Resources Board's (ARB) final Scoping Plan for AB32. Please review the attached submission of our comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/556-scoping\\_plan\\_recommendations\\_srtsnp\\_11\\_13\\_08.pdf](http://www.arb.ca.gov/lists/scopingpln08/556-scoping_plan_recommendations_srtsnp_11_13_08.pdf)

Original File Name: Scoping\_Plan\_Recommendations\_SRTSNP\_11\_13\_08.pdf

Date and Time Comment Was Submitted: 2008-11-18 13:38:52

No Duplicates.

**Comment 102 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sabrina

Last Name: Means

Email Address: [sabrina@caltransit.org](mailto:sabrina@caltransit.org)

Affiliation: California Transit Association

Subject: Comments on Climate Change Proposed Scoping Plan

Comment:

Please see our attached comments, thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/557-comments\\_on\\_proposed\\_scoping\\_plan\\_-\\_letter\\_to\\_the\\_arb\\_board.doc](http://www.arb.ca.gov/lists/scopingpln08/557-comments_on_proposed_scoping_plan_-_letter_to_the_arb_board.doc)

Original File Name: Comments on Proposed Scoping Plan - Letter to the ARB Board.doc

Date and Time Comment Was Submitted: 2008-11-18 14:28:14

No Duplicates.

## **Comment 103 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Chris  
Last Name: Morfas  
Email Address: cmorfas@airquality.org  
Affiliation: Safe Routes to School Nat'l Partnership

Subject: Reduce VMT via Safe Routes to School and School Siting  
Comment:

November 18, 2008

Dear CARB:

Good day. On Thursday, November 20, 2008, it will be my pleasure and honor to offer concise testimony on behalf of the Safe Routes to School National Partnership (SRTSNP) highlighting key arguments made in the attached document submitted to CARB by SRTSNP.

In brief, we suggest that Safe Routes to School infrastructure and non-infrastructure programs, along with improved school siting, can decrease VMT by making it safe, convenient and socially acceptable for kids to walk or bicycle to school. Safe Routes to School and school siting are key examples of tactics that could be employed by CARB and its local government partners to reduce GHG emissions by improving land use and transportation policies.

Sincerely,  
Chris Morfas  
Sacramento, CA  
Safe Routes to School National Partnership

Attachment: [www.arb.ca.gov/lists/scopingpln08/558-scoping\\_plan\\_recommendations\\_srtsnp\\_11\\_13\\_08.pdf](http://www.arb.ca.gov/lists/scopingpln08/558-scoping_plan_recommendations_srtsnp_11_13_08.pdf)

Original File Name: Scoping\_Plan\_Recommendations\_SRTSNP\_11\_13\_08.pdf

Date and Time Comment Was Submitted: 2008-11-18 14:39:06

No Duplicates.



## **Comment 104 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Paul  
Last Name: Dolan  
Email Address: pauld@mendocinowineco.com  
Affiliation: Winery

Subject: AB32 Scoping Plan comments- in favor  
Comment:

November 18, 2008

Honorable Mary Nichols  
Chair, California Air Resource Board  
1001 I Street  
Sacramento, CA 95814

RE: AB32 Scoping Plan comments

Dear Chair Nichols and Honorable members of the Board,

Thank you for the opportunity to comment on the Proposed AB32 Scoping Plan.

On behalf of company Mendocino Wine Company, I am writing in support of the Scoping Plan. I believe that California must continue its leadership on climate action and support the adoption of robust climate policy that takes into account our input below.

As a family owned and operated company, we are especially interested in how California will address the challenges climate change poses. Our actions are altering the balance of nature, and we are watching the world change before our very eyes. Fish populations are in serious decline, our rainforests are disappearing and the planet's topsoil is being eroded and lost. The impact of global warming and its effects on our climate are being felt worldwide, from the hottest summers on record to melting polar ice caps.

As a key California agricultural industry we are uniquely vulnerable to the effects of global warming. Winemakers are experiencing impacts that are changing the face of wine style, structure and composition. I can remember as a young winemaker, thirty years ago, struggling to reach maturity in my grapes of 23.5 to 24° Brix. Now I have a similar challenge to keep the sugars below 28-29° Brix each year while waiting for the tannins to ripen. The Proceedings of the National Academy of Sciences has reported that rising temperatures and volatile weather patterns associated with global warming could result in an 81% reduction of viable grape production acreage for high to premium quality wine. The future of California's multi-billion dollar wine industry is now in question.

It is my belief that AB 32 will help California steer clear of the devastation global warming could bring to our state. Legislation encouraging efficiency helps conserve resources and create

opportunities for new industry. As a small business, I believe AB 32 will help us compete in a low carbon economy, by reducing our energy costs, ensuring our water supply, reward us for the voluntary early actions we have already taken, as well as providing the tools, incentives and support we need to implement further efficiency improvements at our facility.

Here at Mendocino Wine Co, we have taken a stand. We are doing the right things to create quality wines and a healthier planet. By making wine from locally farmed grapes, using sustainable farming practices, utilizing 100% green power and employing earth-friendly packaging, our family-owned and operated company is creating a model of quality and environmental sustainability for other wineries to follow. In recognition of our status as the nation's first carbon neutral winery and our continuing dedication to social responsibility and environmentally sound practices, we received California's highest environmental award, the Governor's Environmental and Economic Leadership Award in 2007. By establishing a strong regulatory framework for emissions reductions, the State also has the opportunity to lead the nation and set an example for other regions around the world.

Thank you for your consideration of our remarks and for your work on this comprehensive plan. We look forward to continuing to be involved in the AB32 process.

Sincerely,

Paul Dolan  
Owner  
Mendocino Wine Company

Attachment: [www.arb.ca.gov/lists/scopingpln08/559-ab32\\_draft\\_testimony\\_11\\_13\\_08\\_\\_2\\_.doc](http://www.arb.ca.gov/lists/scopingpln08/559-ab32_draft_testimony_11_13_08__2_.doc)

Original File Name: AB32 Draft Testimony 11\_13\_08 (2).doc

Date and Time Comment Was Submitted: 2008-11-18 15:23:56

No Duplicates.

**Comment 105 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: The  
Last Name: Pacific Forest Trust  
Email Address: rkatz@pacificforest.org  
Affiliation:

Subject: PFT comments on Proposed Scoping Plan  
Comment:

The Pacific Forest Trust respectfully submits the attached comment letter for your consideration.

Thank you very much.

Attachment: [www.arb.ca.gov/lists/scopingpln08/560-pft\\_comments\\_on\\_proposed\\_scoping\\_plan\\_11.18.08.pdf](http://www.arb.ca.gov/lists/scopingpln08/560-pft_comments_on_proposed_scoping_plan_11.18.08.pdf)

Original File Name: PFT Comments on Proposed Scoping Plan 11.18.08.pdf

Date and Time Comment Was Submitted: 2008-11-18 15:29:56

No Duplicates.

**Comment 106 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mel  
Last Name: Zeldin  
Email Address: melz@capcoa.org  
Affiliation: CAPCOA

Subject: CAPCOA Submittal on the Proposed Scoping Plan  
Comment:

Please see attached CAPCOA letter to Mary Nichols, Re: CAPCOA Proposal for Joint ARB/Air District Implementation of Stationary Source Measures in the Climate Change Proposed Scoping Plan with Comments on Specific Measures.

Attachment: [www.arb.ca.gov/lists/scopingpln08/563-capcoa\\_comments\\_on\\_scoping\\_plan\\_11-18-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/563-capcoa_comments_on_scoping_plan_11-18-08.pdf)

Original File Name: CAPCOA Comments on Scoping Plan 11-18-08.pdf

Date and Time Comment Was Submitted: 2008-11-18 16:21:11

No Duplicates.

## **Comment 107 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jim  
Last Name: Costello  
Email Address: info@tcchamber.com  
Affiliation:

Subject: Comment on Scoping Plan  
Comment:

November 18, 2008

Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95814

RE: Tuolumne County Chamber of Commerce Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the Tuolumne County Chamber of Commerce, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan).

To begin with let it be clear that the Tuolumne County Chamber of Commerce is not convinced that AB 32 is based on solid science. There are a large number of well-known scientists that say otherwise. Be that as it may, while the Tuolumne County Chamber of Commerce is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers take account for the means that will be needed to achieve the goals. AB 32 requires that reductions in GHG emissions must achieve the maximum technologically feasible and cost effective reductions and for the ARB to "consider the cost-effectiveness of these regulations." (HSC §38560) In addition, we believe that the Scoping Plan appropriately allow the SB 375 process to develop regional transportation-related GHG targets. Implementations of the regional planning processes in SB 375 are new and largely untested and could cost California companies untold millions. The 5 MMT figure, while a place holder, nevertheless sets an appropriate benchmark that helps assure that the state can achieve its overall 2020 goal."

As both the state and local governments are faced with critical budget shortages, additional costs to heavily invest in GHG emission technologies in the next 2 to 3 years will become more burdensome for businesses. The State of California has already made itself less competitive in the market place with unnecessary rules and restrictions. There is now an attempt to implement AB 32 with more regulations that will continue our decreasing competitiveness. Reality is that business and developers will only build projects that will be purchased by willing customers and that are profitable. In order to effect the desired change, incentives

must be provided to the business and development communities and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The Tuolumne County Chamber of Commerce strongly encourages the ARB to consider these limitations as it moves forward with the Scoping Plan.

Thank you again for the opportunity to comment. The Tuolumne County Chamber of Commerce looks forward to increased business in California through reasonable implementation of a balanced cost-effective plan to reduce greenhouse gas emissions.

Sincerely,

Jim Costello  
Chairman of the Board

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-18 16:21:41

No Duplicates.

## Comment 108 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Mike

Last Name: Bullock

Email Address: mike\_bullock@earthlink.net

Affiliation: SClub, MTS, SVBC, MoveSD, other

Subject: Improved Car-Parking Strategies and Road Funding

Comment:

What you have now, on car parking is weak. Within your "Role of Local Governments" (Page 26), you state you will help develop tools and best practices for local government. On Page 48-49, you mention car parking; also on pages C-50, C-52 ("Promote employee transit incentive programs, including, telework, carpooling, and parking cash-out policies."), and finally on Page C-78. Nowhere is the concept of "unbundling the cost of parking" presented. Cashout is mentioned but not defined. The state cashout law does more harm than good to this important concept. It needs a more general definition.

I would like to help you strengthen your work with respect to car parking. The potential is huge.

Cashout: See Charts 7 - 27 of my Power Point Charts.

([http://moderntransit.org/sdc/Vista\\_8\\_7\\_08](http://moderntransit.org/sdc/Vista_8_7_08)).

They provide a more generalized form of Cashout. Please study the details. Our Industrial Parks need cashout to transform them to a form that is denser, more mixed use, and less dependant on driving.

Intelligent Parking: This is where so-called "pay parking" is feasible, which should be almost everywhere if we are going to escape the human catastrophe of global warming. "Intelligent Parking" is where parking is fully shared, has its cost fully unbundled in all cases, is priced to guarantee vacancy, and uses good technology. It is detailed in my report, "Intelligent Parking", <http://moderntransit.org/sdc/IntelligentParking6>. As shown in the tables in both of these documents, giving people back their right to choose whether or not they want to pay for parking will greatly reduce driving. This has been fully documented. We can expect at least a 23% drop in driving whenever we unbundle the cost of car parking. This is the most cost-effective way to reduce driving. It is cheaper than free because it will result in less parking being needed and parking is expensive.

I need your help. SANDAG is currently developing a "Smart Growth Design Guideline". I have submitted numerous written comments, talked to them on the phone, given a 90 minute presentation on parking, and gone to their public meetings where I spoke passionately about the need to have their "Guidelines" include good parking policies. I am failing to have any effect on their very outdated work. Their "Guidelines" are going to be 10 years old in their thinking about parking. Because they say "innovative TDM", they think they are doing a great job.

Our state needs to develop a model off-street parking ordinance that implements "Intelligent Parking". The hardware and software needs to be perfected and implemented. San Francisco is getting close. Any team of programmers that help to put on races (Bay to Breakers, for example) could implement most of Intelligent Parking.

Highway funding: Gas taxes are imprecise because they do not account for who is driving where and at what time. Gas taxes have no future anyway, since cars will get better and better mileage. We need PAYD road financing. All license-plate tags in 2010 should contain a RFID. Sensor/transmitters need to start collecting data for automatic billing. Roads should be priced so that they produce an agree-to rate of return on the VALUE of the lane. Note that I said value. Value is the price of land plus construction, at the time of collection. If this is done properly, the state should be able to sell off any or all of our lanes at a fair market, replacement cost. If needed, congestion pricing can be added in to ensure free flow at all times. This approach will have the additional advantage of allowing our state to reduce all taxes and balance its budget. Thank you for getting at least a little bit sane in the "Pricing" section of your document, [http://www.catc.ca.gov/programs/rtp/Adopted\\_Addendum\\_2007\\_RTP\\_Guidelines.pdf](http://www.catc.ca.gov/programs/rtp/Adopted_Addendum_2007_RTP_Guidelines.pdf). (Our Transportation Commission is light years ahead of SANDAG.)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-18 18:56:07

No Duplicates.



**Comment 109 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Audrey

Last Name: Chang

Email Address: achang@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: NRDC Comments on AB 32 Proposed Scoping Plan

Comment:

Please find attached the comments of the Natural Resources Defense Council on the AB 32 Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/575-nrdc\\_comments\\_on\\_proposed\\_scoping\\_plan\\_11.18.08.pdf](http://www.arb.ca.gov/lists/scopingpln08/575-nrdc_comments_on_proposed_scoping_plan_11.18.08.pdf)

Original File Name: NRDC Comments on Proposed Scoping Plan 11.18.08.pdf

Date and Time Comment Was Submitted: 2008-11-18 21:27:34

No Duplicates.

**Comment 110 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

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

Subject: Caltrans and Transportation Funding need to be part of Plan  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/578-carb\\_proposed\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/578-carb_proposed_scoping_plan_comments.pdf)

Original File Name: CARB Proposed Scoping Plan comments.pdf

Date and Time Comment Was Submitted: 2008-11-19 00:49:42

No Duplicates.

## **Comment 111 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Neeva

Last Name: Candelori

Email Address: Neeva\_Candelori@americanchemistry.com

Affiliation: American Chemistry Council

**Subject: Comments Regarding Climate Change Proposed Scoping Plan Appendices  
Comment:**

The attached letter submits comments on behalf of four trade associations representing the foam plastic insulation industry on the CARB Proposed Scoping Plan implementing AB 32. The associations are the Center for the Polyurethanes Industry of the American Chemistry Council (CPI); Extruded Polystyrene Foam Association (XPSA); Polyisocyanurate Insulation Manufacturers Association (PIMA); and Spray Polyurethane Foam Alliance (SPFA).

We appreciate your consideration of the foam plastic industry's comments on this important program. We look forward to working with CARB as it continues its important work.

Attachment: [www.arb.ca.gov/lists/scopingpln08/581-carb\\_foam\\_group\\_response\\_to\\_proposed\\_scoping\\_plan\\_2008-11-18\\_final.pdf](http://www.arb.ca.gov/lists/scopingpln08/581-carb_foam_group_response_to_proposed_scoping_plan_2008-11-18_final.pdf)

Original File Name: CARB Foam Group Response to Proposed Scoping Plan 2008-11-18 Final.pdf

Date and Time Comment Was Submitted: 2008-11-19 07:26:03

No Duplicates.

**Comment 112 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gabe  
Last Name: Petlin  
Email Address: gpetlin@3degreesinc.com  
Affiliation:

Subject: REMA Comments to CARB  
Comment:

Please accept the attached comments from the Renewable Energy Marketers Association (REMA) for consideration by the Air Resources Board.

Thank you.

Gabe Petlin  
3Degrees, Director of Regulatory and Carbon Markets  
REMA President

Attachment: [www.arb.ca.gov/lists/scopingpln08/584-rema\\_comments\\_to\\_carb\\_11-20-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/584-rema_comments_to_carb_11-20-08.pdf)

Original File Name: REMA Comments to CARB 11-20-08.pdf

Date and Time Comment Was Submitted: 2008-11-19 08:47:07

No Duplicates.

**Comment 113 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Bruce  
Last Name: Channing  
Email Address: [clh@ci.laguna-hills.ca.us](mailto:clh@ci.laguna-hills.ca.us)  
Affiliation:

Subject: Scoping Plan  
Comment:

Please see attached letter regarding the Scoping Plan

Attachment: [www.arb.ca.gov/lists/scopingpln08/586-bc\\_ab\\_32\\_scoping\\_plan\\_city\\_comment\\_ltr\\_nov08.doc](http://www.arb.ca.gov/lists/scopingpln08/586-bc_ab_32_scoping_plan_city_comment_ltr_nov08.doc)

Original File Name: BC AB 32 Scoping Plan City Comment Ltr nov08.doc

Date and Time Comment Was Submitted: 2008-11-19 08:51:13

No Duplicates.

**Comment 114 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stan

Last Name: Van Velsor

Email Address: stan\_vanvelsor@tw.s.org

Affiliation: The Wilderness Society

Subject: Comments on AB32 Scoping Plan

Comment:

TWS Comments on AB 32 Scoping Plan

Attachment: [www.arb.ca.gov/lists/scopingpln08/588-tws\\_comments\\_ab32.doc](http://www.arb.ca.gov/lists/scopingpln08/588-tws_comments_ab32.doc)

Original File Name: TWS Comments AB32.doc

Date and Time Comment Was Submitted: 2008-11-19 09:15:26

No Duplicates.

## **Comment 115 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gladwyn  
Last Name: d'Souza  
Email Address: godsouza@mac.com  
Affiliation:

Subject: Distribute infrastructre costs equitably to reduce GHG  
Comment:

Set an equitable cost distribution on pollution. Infrastructure pricing should reflect the burden of polluting the biosphere. The model is tier pricing in energy.

Examples:

CA needs to develop a model off-street parking ordinance that implements "Intelligent Parking" similar to what SF wants and Redwood City may have the begining off.

Traffic impact fees, estimated at 40k per car per ten year period would fund zero pollution changes to the way the air and water basin are destroyed.

PAYD road financing should replace the highway gas tax using GPS or license-plate RFID tags. Roads should be priced so that they produce an agree-to rate of return on the VALUE of the lane. Note that I said value. Value is the price of land plus construction, at the time of collection. Privacy concerns should not allow drivers to permanently impact growing lungs by large roads.

A revenue nuetral carbon tax to address imports

Universal single payer health care to address pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 09:16:35

No Duplicates.

**Comment 116 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Amy

Last Name: McHarg

Email Address: amcharg@beverlyhills.org

Affiliation: City of Beverly Hills

Subject: City of Beverly Hills Comments Re: AB 32

Comment:

Please see attached letter from Beverly Hill Mayor Barry Brucker regarding comments on air resources board proposed scoping plan.

Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/591-ab32.pdf](http://www.arb.ca.gov/lists/scopingpln08/591-ab32.pdf)

Original File Name: AB32.pdf

Date and Time Comment Was Submitted: 2008-11-19 09:30:53

No Duplicates.



## **Comment 117 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Carlos

Last Name: Davidson

Email Address: carlosd@sfsu.edu

Affiliation: San Francisco State University

Subject: comment on auctioning, offsets and low income impacts

Comment:

Comments to ARB on proposed scoping plan  
Carlos Davidson  
Associate Professor/Director Environmental Studies Program  
San Francisco State University  
November 19, 2008

I commend the ARB staff for depth of work and the comprehensive nature of the plan. While it might be possible to get to the 2020 goals with more focused and deeper emissions cuts, a comprehensive approach is a necessity to put us on a path to reach the need 2050 goals. I also commend the ARB for the public health and economic analyses that accompany the scoping plan. As a result of these analyses it is great to see that the scoping plan will result in overall improvements in public health and net economic benefits.

In addition to the aggregate economic analysis it would be good to see analysis of distributional impacts - will low income people bear a disproportionate burden? Will they be able to realize the energy efficiency savings in transportation and in residential energy. or will those savings only be reaped by higher income brackets? If there is a disproportionate burden on lower income Californians then I would like to suggest that ARB pursue the scoping plan suggestion to use auction revenue to mitigate that burden. If auction revenue was used to give additional incentives to low income Californians to switch to fuel efficient cars, insulate homes, install solar power or water heaters, and subsidize public transit, it would help reduce the financial impact of rising energy prices. And it would provide two additional benefits: it would encourage further emissions reductions than would be possible without these programs, and it would help ensure that "being green" is not perceived as something only for the more well to do. To reach our goals beyond 2020 we need a broadly accepted culture of striving for reduced emissions.

The plan is way to timid in its approach to allowance auctioning. It acknowledges the many good reasons to have 100% auctioning but then simply calls it a worthwhile goal, with no commitments or no timelines. The Greenhouse Gas Initiative in the northeast started out with 100% auctioning. California should do the same. At a minimum the plan should at least start with 50% and have a firm commitment to reach 100% in a few years.

Allowing 49% offsets in meeting emissions allowances is counterproductive. The failure of the Clean Development Mechanism offsets has shown that establishing additionality is difficult. There are huge financial incentives for deception. This means that

offsets will require costly design, enforcement and monitoring effort - effort that could be better placed into direct real emissions reductions. I would urge the ARB to limit the use of offsets to 10% of emissions allowances.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 09:46:17

No Duplicates.

## **Comment 118 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kathy

Last Name: Seal

Email Address: kathyseal@gmail.com

Affiliation: Sierra Club

Subject: Ramping up individual and family contributions to curbing GHG

Comment:

without knowing the effect of our steps, why should we take them?

Using compact fluorescents and insulating our homes may eventually lower energy bills a bit, but many other necessary steps such as recycling or driving less give us little if any direct positive feedback. It's hard to lower your carbon footprint without some concrete clear sign that you're doing good.

To give us such a signal, CARB ought to create a website and where individuals and families could record the changes they're voluntarily making in home insulation, windows, appliances, roof color, shading, compact fluorescents, recycling, reducing vehicle travel and other emission-slashing activities. This statewide electronic registry could report back via numbers and graphics the mounting total of greenhouse gas emissions curbed.

Such evidence of meaningful contribution will motivate us to do more, and to urge our friends and family to participate.

Further, CARB should create a website and other public materials that chart graph or in other ways gives evidence of GHG emissions curbed by industry, government and other sectors by the measures mandated by AB 32. That way the public can see and be motivated by the progress we are making as a state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 09:51:18

No Duplicates.

**Comment 119 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stephen

Last Name: Burns

Email Address: Stephen.Burns@chevron.com

Affiliation: Chevron

Subject: AB 32 Scoping Plan Comments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/595-cvx\\_draftscopingplan\\_final.pdf](http://www.arb.ca.gov/lists/scopingpln08/595-cvx_draftscopingplan_final.pdf)

Original File Name: CVX\_DraftScopingPlan\_Final.pdf

Date and Time Comment Was Submitted: 2008-11-19 10:03:32

No Duplicates.

## Comment 120 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Kelly  
Last Name: Lentz  
Email Address: kellyl@mendocinowineco.com  
Affiliation: Green Winery

Subject: Concern about winery green claims  
Comment:

November 18, 2008

Mary Nichols, Chair  
California Air Resources Board  
1001 'I' Street  
Sacramento, CA 95814

Re: Climate Change Proposed Scoping Plan

Dear Ms. Nichols:

I understand that the Air Resources Board (ARB) is about to adopt a Scoping Plan for reducing carbon emissions, including a cap-and-trade program. Mendocino Wine Company urges ARB to include specific language that supports the ability of voluntary purchasers of renewable energy to reduce greenhouse gas (GHG) emissions below the level of the cap. Doing so will allow voluntary markets to help California exceed its goals for renewable energy development and GHG reductions.

We are one of many organizations voluntarily purchasing renewable energy certificates (RECs) and generating on-site solar power as part of our commitment to reducing the greenhouse impact of our operations on the global environment. We refer to these purchases generically as renewable energy.

As long as California has been without a fixed cap on GHG emissions, we feel confident that our purchases have displaced fossil generation and resulted in emission reductions. In this situation, we can make public statements about how we are reducing emissions, and these claims can be easily substantiated.

When a fixed cap on emissions is established under AB 32, starting in 2012, voluntary purchases of renewable energy will still displace fossil generation, but the number of emission allowances—and hence the level of emissions produced—will be unaffected, and our emission reduction claims will become problematic. It is our understanding that unless allowances are retired commensurate with our renewable energy purchases, starting in 2012, renewable energy purchases will no longer reduce GHG emissions. This is a result we hope the State of California will agree is unacceptable.

We further understand that the rules to implement the cap-and-trade program will be written in 2009 and 2010, but the Scoping Plan does not include explicit direction to include the

emission reduction value of voluntary renewable power purchases. Since the Scoping Plan is widely recognized as the "roadmap" for future rulemaking, we are concerned the important market-based emission reductions taken by our company and other voluntary stakeholders will be left off the table.

We ask, therefore, that the Scoping Plan clearly recognize voluntary purchases of renewable energy, renewable energy certificates and on-site renewable generation for the GHG emissions reduction benefits that they provide. The Scoping Plan should explicitly acknowledge the emission reductions created by voluntary renewable purchases by companies such as ours and state that the role of voluntary renewable purchases in achieving California's goal will be developed and described in the cap-and-trade formal rulemaking.

Thank you for considering our comments.

Sincerely,

Kelly Lentz  
Marketing & Sales Coordinator  
Mendocino Wine Co.

Attachment: [www.arb.ca.gov/lists/scopingpln08/599-customer\\_letter\\_to\\_carb\\_\\_3\\_.doc](http://www.arb.ca.gov/lists/scopingpln08/599-customer_letter_to_carb__3_.doc)

Original File Name: Customer letter to CARB (3).DOC

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

No Duplicates.

## **Comment 121 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ravin

Last Name: Carlson

Email Address: carlsonclan@cox.net

Affiliation: U.S. citizen

Subject: Greenhouse Gas Emissions

Comment:

Big polluters should pay for all their emissions: 100% auction of emissions permits, no free giveaways.

- Consider cap-and-trade just a minor tool among market mechanisms. Other tools should be brought forward more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda.
- Make sure the 33-percent renewable electricity standard by 2020 is given the force of law, either through legislation or regulatory action.
- Promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reduction potential for cities and counties.
- Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins and electric cars) beyond CARB's currently too low projected levels.
- Greatly strengthen the too-modest land use and agricultural sections of Plan. The Plan greatly underestimates the significance of methane emissions, by using the 100-year global warming potential. Over a shorter time horizon, methane accounts for 17% to perhaps well over 30% of the state's GHGs, rather than the 5.7% in the 2004 inventory.
- Further increase requirements for zero waste and recycling, as well as Extended Producer Responsibility.
- Ensure that actions to reduce greenhouse gases also help, whenever possible, to clean up California's unhealthy air.
- Limiting offsets will strengthen the demand for clean energy innovation, which in turn provides more good jobs for Californians.
- Any offsets allowed should at most represent only a small portion of a polluter's required emission reductions. They should have stringent protocols ensuring that the reductions are quantifiable, new, permanent, subject to independent third-party verification, enforceable by CARB, and only located in California.
- Offsets from sinks, such as planting trees or avoiding tree cut-downs, should not be allowed, since they are too difficult to

measure and often under-perform.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 11:43:31

No Duplicates.



**Comment 122 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Angela  
Last Name: Howard  
Email Address: ahoward@portolavalley.net  
Affiliation: Town of Portola Valley

Subject: Comments on Air Resources Board Proposed Scoping Plan  
Comment:

Dear Chair Nichols:

On behalf of the Town of Portola Valley, I would like to submit the attached letter with comments on the Air Resources Board's Proposed Scoping Plan.

Sincerely,

Angela Howard  
Town Administrator  
Town of Portola Valley

Attachment: [www.arb.ca.gov/lists/scopingpln08/601-ab\\_scoping\\_plan\\_comments-town\\_of\\_portola\\_valley-19nov2008.pdf](http://www.arb.ca.gov/lists/scopingpln08/601-ab_scoping_plan_comments-town_of_portola_valley-19nov2008.pdf)

Original File Name: AB Scoping Plan Comments-Town of Portola Valley-19Nov2008.pdf

Date and Time Comment Was Submitted: 2008-11-19 11:58:30

No Duplicates.

**Comment 123 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dorothy

Last Name: Rothrock

Email Address: Non-web submitted comment

Affiliation:

Subject: AB 32 Implementation Group

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/602-sp1.pdf](http://www.arb.ca.gov/lists/scopingpln08/602-sp1.pdf)

Original File Name: sp1.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:19:15

No Duplicates.

**Comment 124 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michele

Last Name: Pielsitcker

Email Address: Non-web submitted comment

Affiliation:

Subject: Cal-Tax

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/603-sp2.pdf](http://www.arb.ca.gov/lists/scopingpln08/603-sp2.pdf)

Original File Name: sp2.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:20:02

No Duplicates.

**Comment 125 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jeannette

Last Name: Boller

Email Address: Non-web submitted comment

Affiliation:

Subject: For Snail Mail Users:

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/604-sp3.pdf](http://www.arb.ca.gov/lists/scopingpln08/604-sp3.pdf)

Original File Name: sp3.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:20:30

No Duplicates.

**Comment 126 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Floyd

Last Name: Wicks

Email Address: Non-web submitted comment

Affiliation:

Subject: Southern California Leadership Council

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/605-sp4.pdf](http://www.arb.ca.gov/lists/scopingpln08/605-sp4.pdf)

Original File Name: sp4.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:22:14

No Duplicates.

**Comment 127 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Karl

Last Name: Fischer

Email Address: Non-web submitted comment

Affiliation:

Subject: Pioneer Diecasters, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/606-sp5.pdf](http://www.arb.ca.gov/lists/scopingpln08/606-sp5.pdf)

Original File Name: sp5.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:23:04

No Duplicates.

**Comment 128 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Greg

Last Name: Woolfson

Email Address: Non-web submitted comment

Affiliation:

Subject: Atlas Pacific Corporation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/607-sp6.pdf](http://www.arb.ca.gov/lists/scopingpln08/607-sp6.pdf)

Original File Name: sp6.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:23:44

No Duplicates.

## **Comment 129 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Monika

Last Name: Nakadate

Email Address: Monikamaxella@gmail.com

Affiliation: Student at SF State University

Subject: Individual actions and communities

Comment:

Dear California Air Resource Board members,

As a student of Environmental Studies I would like to take this opportunity and comment on the effort of the Proposed AB 32 Scoping Plan to address the reduction of greenhouse gas emissions in California, especially when we have been lacking a serious action on a national level.

The most important point, that I believe has been made throughout the proposal, is the collaboration of all spheres of our society—from large industries to small businesses, from state to local governments and public. But the most important development has been addressing environmental justice issues and including low-income families that could participate in the new sustainable economy.

However, I believe more stress and pressure should be put on individual actions. We as individuals, until now called consumers, should start addressing ourselves as citizens and be held more responsible for the state of our environment because we have been taking advantage of all the comforts that the present course of economy and extraction of resources have offered us. Participation of people as customers has been mentioned in the plan in connection with energy efficiency and conservation of energy, recycling programs and a choice of vehicles. But the participation should be made mandatory, and we should not be afraid to apply regulations and limits to individual actions. If we want industries to apply new standards and limitations and understand reasons behind this course of action then we have to let them know that we understand why it is necessary, and that we will support their effort while participating in the process.

I believe cities present a great opportunity for comprehensive approach to addressing the reduction of greenhouse gases and individual actions. Senate Bill 375 offers a great start by changing transportation patterns in the cities. Those would include change in the land use and infrastructure patterns, addressing housing needs and jobs for all income levels in the society while creating communities of people who care not just for their comfort but understand that by sacrificing some of their comfortable lifestyles and adjusting their way of life they will ensure the prosperity of the whole community and the city. This would lead to protection of the environment and contribution to increase in health and quality of life.

I agree that more information and access to alternative resources is needed in order to achieve change but unless people are made responsible, even if through regulations, and actively engage in less travel, smaller dwellings, less energy and water use I do not believe overall change will be possible.



Thank you for your time and this opportunity,  
Monika Nakadate

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 12:24:22

No Duplicates.

**Comment 130 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kevin

Last Name: Van Steenberge

Email Address: Non-web submitted comment

Affiliation:

Subject: Lodi Iron Workers, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/609-sp7.pdf](http://www.arb.ca.gov/lists/scopingpln08/609-sp7.pdf)

Original File Name: sp7.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:24:27

No Duplicates.

**Comment 131 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Charlene

Last Name: Marinelli

Email Address: Non-web submitted comment

Affiliation:

Subject: Diesel Emission Reduction

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/610-sp8.pdf](http://www.arb.ca.gov/lists/scopingpln08/610-sp8.pdf)

Original File Name: sp8.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:25:35

No Duplicates.

**Comment 132 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Doug

Last Name: Houston

Email Address: [houstgrp@pacbell.net](mailto:houstgrp@pacbell.net)

Affiliation: The Houston Group for CPRS & CBC

Subject: CPRS & CBC Comments on ARB's Proposed Scoping Plan

Comment:

Please see the attached document that includes comments from the California Park & Recreation Society and the California Bicycle Coalition.

Attachment: [www.arb.ca.gov/lists/scopingpln08/611-08ab32\\_scoping\\_plan\\_comments\\_nov19.pdf](http://www.arb.ca.gov/lists/scopingpln08/611-08ab32_scoping_plan_comments_nov19.pdf)

Original File Name: 08AB32 Scoping PLaN Comments Nov19.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:26:21

No Duplicates.

**Comment 133 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Randolph

Email Address: Non-web submitted comment

Affiliation:

Subject: SSPco

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/612-sp9.pdf](http://www.arb.ca.gov/lists/scopingpln08/612-sp9.pdf)

Original File Name: sp9.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:26:35

No Duplicates.

**Comment 134 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Estelle

Last Name: Williams

Email Address: Non-web submitted comment

Affiliation:

Subject: Estelle Willaims

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/613-sp91.pdf](http://www.arb.ca.gov/lists/scopingpln08/613-sp91.pdf)

Original File Name: sp91.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:27:29

No Duplicates.

**Comment 135 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: DeVecchi

Email Address: Non-web submitted comment

Affiliation:

Subject: AB 32

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/614-sp92.pdf](http://www.arb.ca.gov/lists/scopingpln08/614-sp92.pdf)

Original File Name: sp92.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:28:01

No Duplicates.

**Comment 136 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gordon & Eva  
Last Name: Nipp  
Email Address: gnipp@bak.rr.com  
Affiliation:

Subject: Scoping Plan Comments  
Comment:

The attached file has our comments.

Thanks, Gordon and Eva Nipp, Bakersfield, CA

Attachment: [www.arb.ca.gov/lists/scopingpln08/615-carb\\_final\\_scoping\\_plan\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/615-carb_final_scoping_plan_letter.pdf)

Original File Name: CARB Final Scoping Plan Letter.pdf

Date and Time Comment Was Submitted: 2008-11-19 12:32:05

No Duplicates.



## **Comment 137 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lori  
Last Name: Pfeiler  
Email Address: lpfeiler@escondido.org  
Affiliation: City of Escondido

Subject: Comments  
Comment:

Dear Chair Nichols:

On behalf of the City of Escondido, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan). I have reviewed the letter sent to you by Kyra Ross and Bill Higgins, on behalf of the League of California Cities, dated November 14, 2008. I concur with their comments but will not attempt to comment in as much detail.

Escondido is beginning a number of efforts to reduce our City's greenhouse gas emissions (GHG emissions). We are continuing efforts to locate new development in a compact pattern around our urban core, and expand the use of transit and a central, transit station. We are also developing a number of green building practices for both public and private uses. We are also addressing climate change in our environmental review process.

While the City of Escondido is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers to ensure the goals are realistic and match the means needed to implement them. It appears that the Scoping Plan appropriately allows the SB 375 process to develop regional transportation-related GHG targets. The 5 MMT figure appears to be an appropriate benchmark that should not be increased at this time.

Escondido, like many other cities, is faced with critical budget shortages that will limit our ability to heavily invest in GHG emission technologies in the next 2 to 3 years. In light of these limitations, incentives must be provided to the development community and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The City of Escondido strongly encourages the ARB to consider these limitations as it moves forward with the Scoping Plan

Thank you again for the opportunity to comment. The City of Escondido looks forward to working with the ARB in the future.

Sincerely,  
Lori Holt Pfeiler  
Mayor

Note: Hard signed copy of letter to follow in mail

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 13:05:59

No Duplicates.

**Comment 138 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stephen  
Last Name: Helvey  
Email Address: shelvey@cityofwhittier.org  
Affiliation: City of Whittier

Subject: ARB Scoping Plan  
Comment:

Letter attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/620-ab\\_32\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/scopingpln08/620-ab_32_scoping_plan.doc)

Original File Name: AB 32 Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-11-19 13:33:34

No Duplicates.

## Comment 139 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Walt

Last Name: Seifert

Email Address: saba@sacbike.org

Affiliation: Sacramento Area Bicycle Advocates

Subject: AB 32 Proposed Scoping Plan comments

Comment:

Evaluation of public health benefits

Thank you for expanding the discussion of health benefits in the AB 32 Proposed Scoping Plan. In addition to the air pollution related health benefits, we encourage you to include the health benefits and related cost savings from increased physical activity.

The expected mode shift from driving to human powered transportation will allow people to integrated physical activity into their daily routines. There are significant cost benefits from the increased levels of physical activity resulting from such a mode shift. The recently published report, "Active Transportation for America" quantifies the cost benefits nationally based on two possible mode shift scenarios. This report can be found at <http://www.railstotrails.org/index.html>.

The cost benefit numbers in the "Active Transportation for America" report are conservative. The report understates the cost benefits of a mode shift to more walking and bicycling. It does not address pollution related health benefits nor include the cost savings from a reduction in traffic fatalities, injuries and property damage. As we noted earlier, crash costs are estimated to be more than \$164B annually for the U.S. (AAA Crashes vs. Congestion: What's Cost to Society)

Regional targets

We continue to believe that emission reductions would be more likely to be achieved and more appropriated focused, if the plan included much higher regional land use targets—in the range of 11-14 MMT instead of 2-5 MMT. The higher targets are achievable and would help make recently passed SB 375 more effective.

Addressing VMT

We strongly believe the plan should call for specific reductions in Vehicle Miles Travelled (VMT). The transportation section is the largest source of GHG emissions. Until the recent spike in the price of gas, VMT has continually increased. It will be very difficult to achieve planned emission reductions without directly addressing the largest source of emissions, establishing a goal for VMT reductions and policies that directly, rather than indirectly, relate to that goal.

Long Term Trajectory

The graph of projected greenhouse gas emissions shows emissions increasing until 2010 and declining thereafter. In 2010, the emissions curve turns on a dime and thereafter projected emissions decline in a continued, very steep downward slope for the next 40 years.

It is uncertain whether this emission projection is realistic. It seems unlikely that emission reductions will exceed what is in the plan, especially in the first few years. It certainly is prudent for the plan to have flexibility and for progress to be closely monitored.

Since progress in emission reductions may be less than planned, we recommend that the plan include more tools to reduce transportation related GHG emissions. The tools should be developed and agreed upon in advance so they could be implemented in the short and mid-term. Some possible tools include:

- Parking cashout and parking charges
- Requirement for bicycle facilities (showers, lockers and bike parking) in green buildings
- Expedient implementation of AB 1358, which call for Complete Streets in the circulation element in general plans
- Implementation of Complete Streets concepts in Prop 1B projects
- Retrofitting of existing streets to make them Complete Streets
- Safe Routes to School Programs
- Safe Routes to Transit Programs
- Increase in gas taxes
- Carbon fees

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 14:16:11

No Duplicates.

## **Comment 140 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John D. (Jack)  
Last Name: Van Patten  
Email Address: bookmanjack@comcast.net  
Affiliation:

Subject: Hearing in re: Approval of AB32 Scoping Plan  
Comment:

Dear Members of the Board:

SUBJECT: AB32 Scoping Plan Hearing on November 20, 2008-11-19

I urge you to restore the target in the Scoping Plan for GHG reductions for land use to the 15-18% in the original document.

Current growth patterns put the state on a path that will result in a 50-70 percent increase in driving over the next 30 years, making it virtually impossible for California to reach the 2050 goal of reducing our emissions by 80% over 1990 levels, the amount needed to prevent catastrophic changes to our climate. The current 2020 target of 5 MMT is not high enough to get California on track to achieve the 2050 goal.

In the face of the present economic debacle, and the faster than anticipated worsening of the climate crisis, it is imperative that the Board strengthen, rather than weaken the AB32 Scoping Plan.

'Business-as-usual' has been overtaken by events that do not provide for what we have taken for granted in the past: we are entering the Long Emergency; failing to 'strengthen the things that remain' (the original targets in the AB32 Scoping Plan) only make things so much worse than they need to be.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 14:29:39

No Duplicates.

**Comment 141 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Diane

Last Name: Bailey

Email Address: [dbailey@nrdc.org](mailto:dbailey@nrdc.org)

Affiliation: JOINT COMMENTS

Subject: Joint Enviro Recommendatins on Industrial Sector

Comment:

Please accept this summary of recommendations to strengthen public health protections with two industrial sector measures.

Attachment: [www.arb.ca.gov/lists/scopingpln08/624-enviro\\_recommendations\\_for\\_the\\_industrial\\_sector-one\\_pager.doc](http://www.arb.ca.gov/lists/scopingpln08/624-enviro_recommendations_for_the_industrial_sector-one_pager.doc)

Original File Name: Enviro Recommendations for the Industrial Sector-One Pager.doc

Date and Time Comment Was Submitted: 2008-11-19 15:02:05

No Duplicates.

**Comment 142 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Terri  
Last Name: Shirhall  
Email Address: tshirhall@roseville.ca.us  
Affiliation: City of Roseville

Subject: City of Roseville Comments re. 10/8 Climate Change Proposed Scoping Plan  
Comment:

Attached file is the City of Roseville comment letter re. the  
October 2008 Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/626-2\\_scopingplancomments\\_111808.pdf](http://www.arb.ca.gov/lists/scopingpln08/626-2_scopingplancomments_111808.pdf)

Original File Name: 2\_ScopingPlanComments\_111808.pdf

Date and Time Comment Was Submitted: 2008-11-19 15:13:53

No Duplicates.



**Comment 143 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ron

Last Name: Bates

Email Address: rbates@sogate.org

Affiliation: City of South Gate

Subject: City of South Gate's Comments on Scoping Plan

Comment:

City of South Gate Letter

Attachment: [www.arb.ca.gov/lists/scopingpln08/627-city\\_of\\_south\\_gate\\_arb\\_scoping\\_plan\\_comments.doc](http://www.arb.ca.gov/lists/scopingpln08/627-city_of_south_gate_arb_scoping_plan_comments.doc)

Original File Name: City of South Gate ARB scoping plan comments.doc

Date and Time Comment Was Submitted: 2008-11-19 15:14:00

No Duplicates.

**Comment 144 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ron

Last Name: Santos

Email Address: rsantos@ci.lake-forest.ca.us

Affiliation: City of Lake Forest

Subject: Climate Change Proposed Scoping Plan (Pursuant to AB 32)

Comment:

Please see attached letter from the City of Lake Forest.

Attachment: [www.arb.ca.gov/lists/scopingpln08/628-ab\\_32\\_scoping\\_plan\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/628-ab_32_scoping_plan_letter.pdf)

Original File Name: AB 32 Scoping Plan Letter.pdf

Date and Time Comment Was Submitted: 2008-11-19 15:37:41

No Duplicates.

## **Comment 145 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Linda  
Last Name: Pratt  
Email Address: LPratt@sandiego.gov  
Affiliation: City of San Diego

Subject: City of San Diego response to Scoping Plan- November 19, 2008  
Comment:

Please see attachment for the complete response from the City of San Diego.

It is important to consider our introductory statements before proceeding to the detailed analysis of the Scoping Plan:

Dear Chair Nichols:

The City of San Diego has taken an active role in the review of the Draft Scoping Plan, and this is our second set of comments to ARB. Table One is a summary of the comments previously submitted in July 2008. The statements in this letter are designed to add to, not replace, the previous response from the City of San Diego.

We are requesting that ARB seriously consider our perspective. We are disappointed that very few of the comments previously submitted were captured in the current revision. Similarly, the Local Government Operations Protocol referenced in the Scoping Plan was approved by ARB without many of the requested changes and clarification requested by local governments.

FULL RESPONSE IS ATTACHED.

Attachment: [www.arb.ca.gov/lists/scopingpln08/629-sd\\_comments\\_scoping\\_plan\\_nov\\_19\\_2008-final.pdf](http://www.arb.ca.gov/lists/scopingpln08/629-sd_comments_scoping_plan_nov_19_2008-final.pdf)

Original File Name: SD Comments Scoping Plan Nov 19 2008-final.pdf

Date and Time Comment Was Submitted: 2008-11-19 15:42:46

No Duplicates.

**Comment 146 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Brian

Last Name: Ambrose

Email Address: bambrose@murrieta.org

Affiliation: City of Murrieta

Subject: City of Murrieta Comments on AB 32 Proposed Scoping Plan

Comment:

See file upload.

Attachment: [www.arb.ca.gov/lists/scopingpln08/630-mayor.ab\\_32\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/630-mayor.ab_32_scoping_plan.pdf)

Original File Name: Mayor.AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-11-19 15:50:54

No Duplicates.

**Comment 147 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Aaron

Last Name: Lehmer

Email Address: aaron@ellabakercenter.org

Affiliation: Ella Baker Center for Human Rights

Subject: Ella Baker Comments on Proposed Scoping Plan

Comment:

Thank you for considering our recommendations for AB 32's Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/632-statement-ppsp-10-20-08.doc](http://www.arb.ca.gov/lists/scopingpln08/632-statement-ppsp-10-20-08.doc)

Original File Name: Statement-PSP-10-20-08.doc

Date and Time Comment Was Submitted: 2008-11-19 15:54:25

No Duplicates.

**Comment 148 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert  
Last Name: Wyman  
Email Address: robert.wyman@lw.com  
Affiliation: Latham & Watkins

Subject: California Climate Coalition Comments  
Comment:

Attached is the written testimony of the California Climate Coalition for the November 20, 2008 Board hearing.

Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/635-ccc\\_scoping\\_plan\\_testimony\\_nov\\_20\\_2008.pdf](http://www.arb.ca.gov/lists/scopingpln08/635-ccc_scoping_plan_testimony_nov_20_2008.pdf)

Original File Name: CCC Scoping Plan Testimony Nov 20 2008.PDF

Date and Time Comment Was Submitted: 2008-11-19 16:16:27

No Duplicates.

**Comment 149 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Brandy  
Last Name: Quitevis  
Email Address: brandy@cityofsoledad.com  
Affiliation:

Subject: City of Soledad Response  
Comment:

Please see the attached document containing the City of Soledad's comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/636-sb375ltr.11.19.08.doc](http://www.arb.ca.gov/lists/scopingpln08/636-sb375ltr.11.19.08.doc)

Original File Name: SB375Ltr.11.19.08.doc

Date and Time Comment Was Submitted: 2008-11-19 16:22:32

No Duplicates.

## **Comment 150 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jeremy

Last Name: Cantor

Email Address: [jeremy@preventioninstitute.org](mailto:jeremy@preventioninstitute.org)

Affiliation: Prevention Institute

Subject: Comments on Climate Change Proposed Scoping Plan

Comment:

Prevention Institute is pleased to submit comments on the California Air Resources Board's proposed scoping plan for AB32. Attached you will find a letter with our comments. Please feel free to contact Jeremy Cantor ([jeremy@preventioninstitute.org](mailto:jeremy@preventioninstitute.org)) or Janani Srikantharajah ([janani@preventioninstitute.org](mailto:janani@preventioninstitute.org)) with any questions.

Attachment: [www.arb.ca.gov/lists/scopingpln08/638-prevention\\_institute\\_comment\\_letter\\_on\\_carb\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/638-prevention_institute_comment_letter_on_carb_proposed_scoping_plan.pdf)

Original File Name: Prevention Institute Comment Letter on CARB Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-11-19 16:42:07

No Duplicates.



## **Comment 151 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Keith  
Last Name: Till  
Email Address: ktill@ci.santee.ca.us  
Affiliation:

**Subject: City of Santee Comments on Air Resources Board Proposed Scoping Plan  
Comment:**

November 19, 2008

Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95814

RE: City of Santee Comments on Air Resources Board Proposed  
Scoping Plan

Dear Chair Nichols:

On behalf of the City of Santee, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan.

We are currently making plans to reduce our City's greenhouse gas (GHG) emissions with cost efficient and innovative solutions. As part of our City's Sustainability Project, we will be conducting energy audits, completing GHG inventories, creating action plans and implementing cost effective programs to reduce emissions and improve our carbon footprint.

While the City of Santee is generally supportive of a number of the programs and policies outlined in the Scoping Plan, it is crucial that state policymakers account for the means that will be needed to achieve the goals. With the state's recent "take" of local redevelopment dollars, along with declining property tax and sales tax revenues, we have concern about the ability of local jurisdictions, like ourselves, to finance many of these efforts on their own.

We encourage ARB to consider what can be done to provide incentives for the type of planning and decision-making that will be required to reduce GHG emissions. While we recognize that incentives may be beyond the scope of the ARB's direct authority, the board has an important voice within state government. We also request that any targeted fees maximize economic benefits and minimize economic harm. Local governments enact fees to cover costs associated with operating local programs, with an understanding of the impact that fee may have on the community. We must not implement fees without looking at the cost to communities and local businesses that allow our communities to thrive.

Finally, as both the state and local governments are faced with

critical budget shortages, additional costs to invest heavily in GHG emission technologies in the next two to three years will become more burdensome for local governments. While local governments can influence development design to a certain extent, the reality is that developers will only build projects that are profitable and will be purchased by willing customers. In order to effect the desired change, incentives must be provided to the development community and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The City of Santee strongly encourages the ARB to consider these limitations as it moves forward with the Scoping Plan

Thank you again for the opportunity to comment. The City of Santee looks forward to working with the ARB in the future.

Sincerely,

Keith Till  
City Manager

Attachment: [www.arb.ca.gov/lists/scopingpln08/640-ab\\_32\\_scoping\\_plan\\_letter.doc](http://www.arb.ca.gov/lists/scopingpln08/640-ab_32_scoping_plan_letter.doc)

Original File Name: AB 32 Scoping Plan Letter.doc

Date and Time Comment Was Submitted: 2008-11-19 16:45:05

No Duplicates.

**Comment 152 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard

Last Name: Holober

Email Address: holober@consumercal.org

Affiliation: Consumer Federation of California

Subject: CFC Support for Vehicle Feebates in AB 32 Scoping Plan

Comment:

Consumer Federation of California's support letter for vehicle feebrates in AB 32 scoping plan is attached. We plan to testify at November 20 2008 hearing.  
Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/641-081119\\_carb\\_feebate\\_ltrhead.pdf](http://www.arb.ca.gov/lists/scopingpln08/641-081119_carb_feebate_ltrhead.pdf)

Original File Name: 081119 CARB feebate ltrhead.pdf

Date and Time Comment Was Submitted: 2008-11-19 16:48:35

No Duplicates.

## **Comment 153 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Judy  
Last Name: Corbett  
Email Address: jcorbett@lgc.org  
Affiliation: Local Government Commission

Subject: Local Governments for target of 11-14 MMTCO<sub>2</sub>e  
Comment:

Dear Air Resources Board Members:

While we appreciate CARB's inclusion of better community design in reducing VMT, the proposed emissions reduction target for land use and transportation (5MMT) is very low. Local governments can do much better, and with support from the State, we can do it much faster. We believe the target should be at between 11-14 MMT.

Please see our attached letter which includes signatures from 70 Local Government Commission members.

Thanks,

Judy Corbett

Attachment: [www.arb.ca.gov/lists/scopingpln08/642-letter\\_to\\_carb\\_10.24.doc](http://www.arb.ca.gov/lists/scopingpln08/642-letter_to_carb_10.24.doc)

Original File Name: Letter to CARB 10.24.doc

Date and Time Comment Was Submitted: 2008-11-19 16:50:50

No Duplicates.

**Comment 154 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Rob  
Last Name: Rundle  
Email Address: rru@sandag.org  
Affiliation: SANDAG

Subject: AB 32 Scoping Plan Comments  
Comment:

SANDAG respectfully submits comments on the AB 32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/643-scoping\\_plan\\_letter\\_111908.pdf](http://www.arb.ca.gov/lists/scopingpln08/643-scoping_plan_letter_111908.pdf)

Original File Name: Scoping Plan Letter\_111908.pdf

Date and Time Comment Was Submitted: 2008-11-19 16:52:08

No Duplicates.

**Comment 155 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom

Last Name: Blabey

Email Address: tom@goletavalley.com

Affiliation: Goleta Valley Chamber of Commerce

Subject: AB 32 Scoping Plan

Comment:

Signed hard copy will submitted via USPS.

Attachment: [www.arb.ca.gov/lists/scopingpln08/644-ab\\_32\\_19nov.doc](http://www.arb.ca.gov/lists/scopingpln08/644-ab_32_19nov.doc)

Original File Name: AB 32 19NOV.doc

Date and Time Comment Was Submitted: 2008-11-19 16:54:57

No Duplicates.

**Comment 156 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Don

Last Name: Anair

Email Address: danair@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Trucks and Goods Movement Comments

Comment:

Please find attached comments regarding the heavy-duty trucks and goods movement portion of the scopingplan submitted on behalf of natural Resources Defense Council, Sierra Club California, The Center for Energy Efficiency and Renewable Technology, American Lung Associatio of California, and Environmental Defense Fund.

Regards,

Don Anair

Senior Analyst

Union of Concerned Scientists

Attachment: [www.arb.ca.gov/lists/scopingpln08/645-trucks\\_and\\_goods\\_movement\\_scoping\\_plan\\_comments\\_11-19-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/645-trucks_and_goods_movement_scoping_plan_comments_11-19-08.pdf)

Original File Name: Trucks and Goods Movement Scoping Plan Comments 11-19-08.pdf

Date and Time Comment Was Submitted: 2008-11-19 16:55:24

No Duplicates.

**Comment 157 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: roy  
Last Name: ramsland  
Email Address: royr@lahabracity.com  
Affiliation:

Subject: AB32 scoping Plan comments  
Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/scopingpln08/646-ab\\_32\\_scoping\\_plan\\_\\_nov08\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/646-ab_32_scoping_plan__nov08__2_.pdf)

Original File Name: AB 32 Scoping Plan nov08 (2).pdf

Date and Time Comment Was Submitted: 2008-11-19 17:03:52

No Duplicates.



**Comment 158 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mark

Last Name: van de Kamp

Email Address: mvandekamp@ci.santa-maria.ca.us

Affiliation: City of Santa Maria

Subject: AB 32 Scoping Plan Hearing Letter

Comment:

Attached is a letter from the City of Santa Maria to the ARB.

Attachment: [www.arb.ca.gov/lists/scopingpln08/647-air\\_resources\\_board\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/647-air_resources_board_letter.pdf)

Original File Name: Air Resources Board letter.pdf

Date and Time Comment Was Submitted: 2008-11-19 17:03:57

No Duplicates.

**Comment 159 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lisa

Last Name: Novotny

Email Address: lnovotny@lakewoodcity.org

Affiliation:

Subject: City of Lakewood comments on proposed scoping plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/648-lakewood\\_arb\\_comment\\_letter\\_to\\_proposed\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/scopingpln08/648-lakewood_arb_comment_letter_to_proposed_scoping_plan.doc)

Original File Name: Lakewood ARB comment letter to Proposed Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-11-19 17:06:36

No Duplicates.

**Comment 160 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jorge

Last Name: Rifa

Email Address: jorger@ci.commerce.ca.us

Affiliation: City of Commerce

Subject: AB32 Proposed Scoping Plan

Comment:

Please see attached comment letter from City of Commerce / Mayor  
Del Rio.

Attachment: [www.arb.ca.gov/lists/scopingpln08/649-  
ltr\\_del\\_rio\\_081119\\_arb\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/649-ltr_del_rio_081119_arb_proposed_scoping_plan.pdf)

Original File Name: ltr Del Rio 081119 ARB Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-11-19 17:39:12

No Duplicates.

**Comment 161 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Autumn  
Last Name: Bernstein  
Email Address: autumn@climateplan.org  
Affiliation: ClimatePlan

Subject: ClimatePlan comments - Draft Scoping Plan  
Comment:

please see attachment

Attachment: [www.arb.ca.gov/lists/scopingpln08/651-climateplan\\_11-19-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/651-climateplan_11-19-08.pdf)

Original File Name: ClimatePlan\_11-19-08.pdf

Date and Time Comment Was Submitted: 2008-11-19 17:42:12

No Duplicates.

**Comment 162 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club's Top Priorities for Changes in Scoping Plan  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA,  
November 19, 2008

To California Air Resources Board Members and Staff:

Sierra Club California commends CARB's forward movement on this comprehensive, far-reaching AB 32 Proposed Scoping Plan. It can ultimately be a model for the nation and the world. The Plan will help California build a stronger, cleaner economy that will create jobs, protect us from oil price surges, and reduce pollution that causes climate disruption.

Sierra Club welcomes this opportunity for comment. At this critical decision point, and in ensuing years as AB 32 implementation measures are developed in more detail, Sierra Club will continue to press for those high-priority measures most likely to move us forward quickly to a low-carbon energy economy while maintaining fairness and equity.

CARB's Proposed Scoping Plan is moving in the right direction. We support the ten specific changes on pages 3-4. We recommend further strengthening, however, before the Plan is adopted in December. Sierra Club's volunteers and staff have prepared a full set of comments, presented below.

= = = = =

Our top priorities for changes in the Proposed AB 32 Scoping Plan:

1) Concentrate on carbon fees to generate revenues, but if cap-and-trade is used, CARB should commit to a rapid implementation of 100% auctioning of allowances.. If offsets are allowed, they must be very limited, located only within or near our state's border, and have no adverse impacts on environmental justice. Program revenues should go toward GHG reduction programs, such as clean technologies, green jobs, and aid for low-income consumers and small businesses.

2) Increase the goals for emissions reductions from lower vehicle traffic by enforced regional land use planning requirements.

3) Require commercial recycling and take meaningful steps toward for zero waste and Extended Producer Responsibility (EPR).

Additional priorities include:

1) Consider cap-and-auction just one tool among market mechanisms. Other tools should be brought forward more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda. See details in the following pages.

2) Make sure the 33% renewables electricity standard is achieved before 2020, either through legislation or regulatory action. Promote and enable Community Choice Electricity Aggregation (CCA) and feed-in tariffs as potentially powerful GHG reduction mechanisms. Implement the CPUC RPS Report, October 2008, which states (p. 10): "If the state is required to generate 33% of its energy from renewable resources by 2020, then all new procurement of new energy resources between now and 2020 must be entirely renewable energy, except some new fossil for peaking capacity and to replace aging fossil plants critical to renewable integration."

3) Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins and electric cars) beyond CARB's currently too low projected levels. This would reap huge GHG reductions.

4) Place a higher priority on reducing methane emissions, since the Plan greatly underestimates the significance of methane emissions by using the 100-year global warming potential. Over a shorter time horizon, methane accounts for 17% to perhaps well over 30% of the state's GHGs, rather than the 5.7% indicated in the 2004 inventory.

5) Ensure that actions to reduce greenhouse gases also help, whenever possible, to clean up California's unhealthy air, especially in already highly impacted areas.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 18:13:12

No Duplicates.

## Comment 163 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club's Overall Comments on Scoping Plan

Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

OVERALL COMMENTS:

- We are pleased that the Proposed Plan seeks to meet the law's requirement of rolling back our greenhouse gas emissions to 1990 levels by 2020.
- Scientists now suggest, however, that goal of 1990 levels by 2020 may be inadequate. The Plan now wisely incorporates intentional redundancies and a "margin of safety" that could anticipate the possibility that urgent action is more pressing than current assumptions would indicate. The GHG concentration in the atmosphere may be at the tipping point, as evidence of the newly recognized rapid release of arctic permafrost and seabed methane gives us even less time for GHG reductions before runaway warming takes over.
- We welcome this Plan's statement that California cannot afford delay in reducing pollution that causes global warming. The potential costs of inaction or delayed action are immeasurably greater than the cost of implementation now.
- CARB's plan, which relies predominately on direct regulations for the electricity and transportation sectors to reach the state's 2020 emission reduction goal, sets a standard for other states and the federal government in most areas. However, there are substantive flaws in the plan's approach to "cap-and-trade" and "offsets."
- Sierra Club strongly supports the new plan's promises to cut more emissions than previous drafts did. We also support the plan's proposal to include: auctioning of emission allowances to polluters; more limitations on offsets; recognition of much higher potential for recycling and zero waste; more momentum for significant changes in current land use and transportation planning; and more emphasis on green job creation in the fields of clean power and energy efficiency. The Plan now makes a stronger case for the economic and health benefits of clean energy.
- The Plan correctly points out that many powerful parallel policies must be pursued in order to remove all the state's market barriers and regulatory impediments to GHG reduction. State climate programs need the full force of CARB's backing to such parallel measures as Feed-In Tariffs, Carbon Fees and Community

Choice Electricity

- We support the inclusion of co-benefits from GHG reductions such as public health improvements and better energy efficiency.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 18:19:12

No Duplicates.



## Comment 164 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club: Recommended Actions: Role of State and Local Governments  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

### II. RECOMMENDED ACTIONS

#### A. ROLE OF THE STATE: SETTING AN EXAMPLE (p. 24)

- Sierra Club applauds the explicit commitment of the state government to lead by example, with a target of a minimum of 30 percent reduction by 2020. We encourage immediate implementation of all the actions listed, plus more to be identified.

#### B. ROLE OF LOCAL GOVERNMENT: ESSENTIAL PARTNERS (p. 26)

- Sierra Club is pleased that SB 375 requires CARB to work closely with local governments to establish strong regional targets for greenhouse gas reduction through the SB 375 process.

- We believe CARB's goal for local governments of a 15% GHG reduction from current levels by 2020 is feasible.

- CARB should set a higher goal of at least 11 million metric tons in greenhouse gas reductions to be achieved from reductions in vehicle miles traveled. We believe research supports the feasibility of a higher goal.

- CARB should provide substantial technical and financial assistance to local governments, in addition to guidance protocols, to help them reduce greenhouse gases from transportation and land use, as well as other sectors, including energy and recycling. These governments are fiscally hard-pressed by the economy's downturn and credit collapse. Many are facing employee layoffs. They do not have the talent or expertise to devise and execute such GHG plans. They also need financial and technical assistance from state and federal sources; compliance will be difficult without that aid.

- SB 375 is insufficient by itself. Needed also are tools for local governments to translate GHG reduction targets into local action.

- CARB should actively promote and facilitate Community Choice Electricity Aggregation (AB 117, 2002), which Sierra Club believes is the single most potent step municipalities can take to quickly reduce their greenhouse gas emissions substantially in the next decade.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 18:24:52

No Duplicates.

## Comment 165 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club's Comments on Emissions Reductions, Cap-and-Auction, Offsets  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

### C. EMISSIONS REDUCTION MEASURES

- We are concerned about the following statement by CARB on p. 28:

"Expiration of existing utility long-term contracts with coal plants will reduce GHG emissions when such generation is replaced by renewable generation, coal with carbon sequestration, or natural gas generation, which emits less CO<sub>2</sub> per megawatt-hour." This statement is too vague to be of use for policy guidance, since there is a big difference between replacing coal plants with natural gas and building renewables. On average, when compared to coal, natural gas plants reduce carbon dioxide by roughly 40%. And carbon sequestration technologies—in the near term timeframe—are expected to capture and sequester only a tiny fraction of carbon emissions from coal plants. Both of these options compare quite unfavorably with most renewables. At present carbon sequestration is too costly and under-researched. The additional energy required to separate and sequester carbon makes this an uneconomic strategy.

Further expansion of natural gas generation cannot be the direction if GHG reduction targets are to be met. Instead, no new fossil fuel generation plants should be built and all new investment capital should be put into renewable, zero-emission generation. All actions should keep to the fast path toward >80% reduction by 2050. A careful examination of data will show that achieving California's clean energy policies, including the 33% renewable standard and both the short and long-term greenhouse gas reduction targets, will require all new generation to be renewable.

#### 1. California Cap and Trade Program Linked to Western Climate Initiative (p. 30)

Direct Emission Reductions: Sierra Club is pleased that the Plan proposes most of the required GHG reductions come from performance standards that directly reduce emissions, such as California's clean-car, renewable-energy, and energy-efficiency programs, and incentive programs like the Solar Initiative, with only 20% proposed for the carbon pollution market program. If possible, we would like to see that percentage made even lower.

The Plan correctly points out that many powerful parallel policies must accompany "cap and trade" in order to remove all the state's ingrained market barriers and regulatory impediments to GHG

reduction. State climate programs need to give these parallel measures - like Feed-in Tariffs, carbon fees, and Community Choice Electricity Aggregation - the full force of ARB's backing.

- Sierra Club urges CARB to consider the merits of replacing cap and trade with a carbon fee. A carbon fee would aid business planning and benefit businesses, because the price of carbon under a fee system is more predictable than the outcome of a cap and trade/auction. In addition, such a fee would provide a predictable source of income for the state to put into Scoping Plan implementation. Under the precedent of the Sinclair Paint case, expenditures of revenue from carbon fees must be related to the issue of carbon emissions. CARB has not given this fee option the attention or study it merits.

We urge CARB to make even clearer that cap-and-trade is no panacea. Over-reliance on unproven cap-and-trade schemes would be a risky gamble.

- If California establishes a cap-and-trade program, it should require 100 percent auction from the start in order to be fair to everyone, including consumers and producers. Auctioning pollution allowances is the simplest, most fair and effective choice. Polluting industries should receive a clear, immediate indication that the state is heading in this direction. CARB's draft implementation plan says that achieving 100 percent auctioning is a "worthwhile goal."

- In the event a cap-and-trade program is adopted, we agree with the Market Advisory Committee's recommendation of "a transition to full auction within the cap-and-trade program, noting that a system in which California ultimately auctions all of its emission allowances is consistent with fundamental objectives of cost-effectiveness, fairness and simplicity." (Appendix I, p. C-19) On the other hand, we are very concerned by CARB's quote that "WCI Partner jurisdictions have agreed to a minimum percentage of allowances auctioned increasing from 10 percent in the first three-year compliance period to 25 percent in 2020." These low amounts would fail to provide an incentive for early GHG reductions. In addition, the climate crisis is so great, that we need substantial revenue as soon as possible to support massive reductions of GHGs and other air pollutants through fostering the transition to a low-carbon society.

- All of the Northeastern and Mid-Atlantic states involved in the Regional Greenhouse Gas Initiative (RGGI) decided to auction nearly or fully 100 percent of their allowances, even though a much lower minimum was discussed earlier in the RGGI process. Although RGGI was severely flawed by over-issuing allowances, the RGGI states raised \$38.6 million in the first U.S. auction for global warming pollution permits. This money can be used to benefit consumers and invest in clean energy and other green investments.

- Giving away pollution permits for free would generate windfall profits for polluters and enrich out-of-state corporate shareholders at the expense of Californians.

- Sierra Club strongly supports the CPUC and CEC recommendation that "all auction revenues be used for purposes related to AB 32." This money should go toward clean energy technologies, public transit and environmental mitigation, green jobs, and aid for low-income consumers and small businesses. Funding will also be

required to provide training in renewable energy job skills for people now working in the fossil fuel industry and to help low-income consumers and small businesses reduce their utility bills through greatly improved energy efficiency.

- Sierra Club is concerned that aligning with the Western Climate Initiative (WCI) could dilute California's program and result in fewer emissions reductions and more delays, unless California can bring other states up to higher standards than WCI is currently recommending. The Design Recommendations for the WCI Regional Cap-and-Trade Program states (Appendix I, p. D-54): "The WCI recommends each Partner auction a minimum percentage, between 25 percent and 75 percent, of its allowance budget." If California agrees to this, it could mean that between 25% and 75% of emissions allowances will be given away for free to the biggest polluters in the state. This is unacceptable.

- Direct reductions in capped sectors are vastly preferable to offsets. CARB should require power and oil companies to invest in renewable energy and cleaner transportation, rather than to pay someone else in some other jurisdiction to reduce their pollution. Any offsets should be limited in number and subjected to rigorous criteria (See more discussion below). We are also concerned about how WCI's recommendations for cap-and-trade and offsets relate to concerns of the environmental justice community. We note that, among WCI member states, California is the only state with an official environmental justice advisory committee for climate issues, and we are disturbed by the failure of the WCI process to give sufficient attention to EJ concerns.

- California should not allow emissions trading with any jurisdiction that does not have a hard emissions cap of AB 32-like stringency, because such trading would remove the assurance that our emissions reductions were real.

- No trading in emissions should be allowed if it causes "hot spots" that exacerbate air pollution at the local level, especially within communities already beset by environmental justice issues.

- Aggressive steps must be taken to guard against leakage by measuring the carbon emission at its actual point of production for electrical generation consumed in CA at its actual point of production.

- Every product manufactured in the world today has its own carbon footprint—the carbon emissions associated with the production of that product. To maintain a fair market for California goods, CARB should require that producers of emission-intensive products imported for consumption in California purchase the same emissions allowances that California producers must when they sell their products in the same market. Similarly, emissions associated with products produced in California but exported should be allocated to the exporting state or nation rather than California. Any other principle would sorely disadvantage California industries and act as a powerful lever for driving additional jobs offshore.

#### OFFSETS

CARB's Plan undercuts its cap-and-trade program by unduly relying on offsets. These are credits that polluters in capped sectors can buy based on estimated pollution reductions made by others in uncapped sectors. In this way, offsets substitute for cuts that

could have been made directly by polluters in the electricity, industrial, and transportation sectors directly addressed by cap-and-trade. Both CARB and WCI would allow approximately half of the required pollution reductions under a cap-and-trade system to occur through offsets.

However, CARB's plan goes beyond the WCI's minimum offset limit. WCI allows states to use offsets for as much as 49 percent of reductions over the lifetime of the program without rules on when polluters can use offsets. Under that approach, polluters could rely entirely on offsets in the early years of the program, which could allow polluters in capped sectors to delay making their own emission reductions until later years, in some cases not until 2018. In contrast, California has decided it will limit the use of offsets to 49 percent during each three-year round of reductions under WCI. In that way, California will guarantee at least some real reductions in sectors covered by a cap-and-trade system throughout the program's earlier years.

Rather than outsourcing efforts around the world through offsets to cut GHG emissions, California should be aggressively harnessing its own energies and capacities to develop new clean technologies that can help reduce global warming pollution here and around the world.

- If offsets are allowed, they must be very limited in number and subjected to rigorous criteria. The Proposed CARB Scoping Plan suggests limiting offsets to 10 percent of a firm's "compliance obligation." CARB must clarify that this means that no more than 10 percent of the emitter's required reductions may come from offsets, not 10 percent of its total emissions.
- While the proposed plan does limit emission offsets more than the draft did, it still allows up to 49 percent of emission reductions to come from offsets, from anywhere in the world - not just from California. This would allow pollution to continue in low-income communities that already carry a heavier burden of polluting industries. ARB must put in place strict safeguards to assure that pollution trading and offsets do not harm air quality in those communities.
- We are opposed to any system that would relieve any domestic emitter of carbon from paying for their fair share of the costs of the carbon they emit in exchange for "offsets," either for internationally produced CO2 emissions or domestically for activities designed to enhance carbon sinks, like tree planting. While government and private support of improved soil carbon content and reforestation are highly desirable, it is impossible to retain the integrity and effectiveness of a program to reduce domestic CO2 emissions if it is combined with an international trading mechanism involving efforts to preserve and enhance carbon sinks.
- We oppose trading between sources of carbon pollution and sinks, like forests, that store carbon. The ability of forests to store carbon should not become a justification for maintaining higher emissions of air pollution. We need both 80% reductions in domestic CO2 emissions and strong programs to enhance carbon sinks; we should not "trade" them off against each other. This separation of carbon control systems is especially important given the increasing vulnerability of California's forests and other flora owing to fire, drought and potential effects of climate change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 18:30:52

No Duplicates.

## Comment 166 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Bud

Last Name: Beebe

Email Address: bbeebe@smud.org

Affiliation: SMUD

Subject: Oral Comments - AB32 Preliminary Scoping Plan

Comment:

SMUD - Oral Version - Beebe - [3 minutes]  
Items for CARB public comments to be presented Nov 20th with  
written follow-up

We appreciate the hard work that the ARB staff has done in putting together a comprehensive approach to meeting the AB32 targets. SMUD supports the electric sector programmatic measures; the 33% RPS, the energy efficiency targets, the California Solar Initiative, and the need for allowance trading.

[Don't start Cap & Trade without Transportation Sector] With respect to cap and trade, one of the most important considerations that the ARB has maintained throughout the development of the Scoping Plan has been one of fairness. We applaud this. However, the scoping plan shows the electric sector and industrial sectors subject to a cap in 2012, but the transportation and natural gas sectors not until 2015. Not requiring allowances to be held by transportation and natural gas amounts to preferential treatment and places considerably more burden for paying for AB32 upon the electricity and industrial sectors. This is a fairness issue that cannot be overlooked.

[Specific inclusion of some early offset programs needed now.] The PSP makes the case that inclusion of emissions offsets will help mitigate allowance prices under cap and trade. Today, the carbon offset industry in California is truly just getting started. Available protocols that might enable compliance are limited. Development of projects under those limited project types are very preliminary, and projects take years to provide first reductions. SMUD has had some experience with this through our voluntary customer carbon offset program for which we are developing two dairy digester projects and are soliciting additional offsets through competitive bids. But to truly help, ARB could accelerate its carbon offset protocol process and fast-track adoption of regulations under H & S Code § 38571 to verify and enforce reductions so that verified offsets can be banked early and used for compliance in 2012.

[Linear reducing cap not practical] As required, the Scoping Plan identifies sufficient Greenhouse Gas emission reductions to enable California to meet its emissions goal by the year 2020. However Figure 1 of Appendix C shows, significant mandatory reductions are expected to occur even in the earliest years of the program and continue evenly throughout the period. We are unaware of specific investigations that show how the Scoping Plan programs will produce this linear reduction of emissions with time. It's



clear that such investigations will be needed before setting yearly emission caps. Simply assuming that a linear reduction in emissions is achievable is insufficient, and could well increase costs unnecessarily.

Thank you for your consideration of our comments, these and some additional suggestions will be submitted in written form. Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/656-smud\\_oral\\_comments\\_-\\_scoping\\_plan\\_-\\_20nov.doc](http://www.arb.ca.gov/lists/scopingpln08/656-smud_oral_comments_-_scoping_plan_-_20nov.doc)

Original File Name: SMUD Oral comments - Scoping Plan - 20Nov.doc

Date and Time Comment Was Submitted: 2008-11-19 18:33:40

No Duplicates.

## Comment 167 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comments on Light Duty Vehicle GHG Standards  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

2. California Light-Duty Vehicle GHG Standards (p. 38)

- Sierra Club supports implementation of the Pavley "Clean Cars" standards, which continue to call for reduction of global warming pollution from personal vehicles. While the Pavley standards will help us to meet 2020 requirements for greenhouse gas reductions, California needs more improvements in vehicle technology before 2020 in order to meet our 2050 goals. The state should immediately begin a dramatic shift toward plug-in hybrid electric vehicles and battery electric vehicles to begin the ramp-up needed to meet 2050 greenhouse gas reduction goals. This should be stated specifically in the Plan to make sure it is implemented.
- The state should immediately create a Battery Electric Vehicle Partnership with industry to speed the electrification of its light-duty vehicle fleet.
- The minimum goal of 7,500 Zero Emission Vehicles (ZEVs) currently required by the Zero Emission Vehicle Program in 2012-2014 is grossly inadequate. CARB should establish a goal of hundreds of thousands of ZEVs in that timeframe, and recommend increased funding for immediate development of plug-in hybrid vehicles and infrastructure for all plug-in vehicles.
- CARB should create a program and incentives to encourage conversion of the 100,000 hybrids now in use to plug-in hybrids, and mandate all appropriate state fleet vehicles be plug-in or zero-emission vehicles.
- CARB's Plan to reduce tailpipe emissions from cars and trucks recommends that the state evaluate and possibly implement a "feebates" program, a system of one-time rebates and surcharges on new passenger cars and light trucks based on the amount of global warming pollution they emit. Sierra Club supports a feebates program that could supplement California's tailpipe standards. According to a University of Michigan study, implementing a clean car discount program would deliver an additional 21 percent reduction in global warming pollution beyond the tailpipe standards.

Important: Sierra Club supports adoption of a "feebate" system in addition to the Pavley regulations, not just as a back-up to the Pavley regulations.

A feebate program would make cleaner cars more affordable for everyone. Cleaner cars cost less to operate, so people would save money on gas. Automakers would have an added incentive to produce cleaner vehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 18:34:17

No Duplicates.

## Comment 168 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comments on Energy Efficiency

Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

### 3. Energy Efficiency (p. 41)

- Sierra Club supports all the energy-efficiency efforts listed by CARB. In fact, we believe that even greater reductions in the pollution that causes global warming can be gained by further strengthening efficiency and conservation efforts. In particular, it is necessary to strengthen independent auditing, measurement and verification of efficiency measures and programs.

- The Plan's goal of 32,000 gigawatt-hours of electric power demand reduction by 2020 falls far short of the economic potential for 60,000 gigawatt-hours of savings if all technology options are included (as described in the California Energy Commission 2007 Integrated Energy Policy Report, p. 98). The larger goal is more in line with the Western Governors efficiency recommendation of 20% reduction from projected demand, which their advisory panel said was likely achievable well before the 2020 target year if best practices were used.

- The mandatory Green Building Standards Code update scheduled for 2010 needs to be strengthened. CARB pressure could help. Commissioning, quality control and enforcement of green building standards and practices in actual construction and renovation has become acutely important as evidence mounts within the trade that many so-called "green" projects do not deliver the efficiency savings advertised.

- Can CARB provide more detail in terms of the three measures in CR-1 (separate out the expected reductions from the three strategies outlined)?

- By 2020, California should be able to go well beyond the SB 1470 goal of only 0.1 million tons of annual reductions from solar water heating, through encouraging public-private partnerships.

- CARB should recommend to the CPUC that energy-efficiency programs be administered independently from the utility companies, and expand the use of Standard Offer contracts based upon performance. The California Public Utilities Commission investigated this in 2002 and concluded that independent providers were more cost effective, particularly for residential customers. The CPUC is developing independent and objective systems for measuring and verification of energy-efficiency program savings,

and should be urged to fully deploy this in a timely manner.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 18:37:23

No Duplicates.

## Comment 169 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comment on Renewables Portfolio Standard

Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

#### 4. Renewables Portfolio Standard (p. 44)

- Sierra Club is pleased to see CARB's recommendation for a 33% Renewable Portfolio Standard (RPS) for electricity providers. This forward-thinking measure should be quickly given the force of law for all utilities, either by regulatory action or by legislation. On July 24, 2008, Sierra Club presented the Governor and the legislature's leadership with a 14-point plan to reform and supplement RPS.
- We appreciate the mention of "broad-based participation from many parties and the removal of barriers." We look forward to more consideration of the environmental and consumer points of view.
- Although the Plan mentions "Community Energy" and "municipal utility operations," there is no mention of Community Choice Aggregation (CCA), a specific authority under California law (AB 117, Migden). CCA offers large potential for local governments to move aggressively toward meeting or exceeding the state's mandated Renewable Portfolio Standards (RPS). Over 40 cities and counties in the state have performed feasibility studies financed by the California Energy Commission and the U.S. Department of Energy, with over two dozen jurisdictions in advanced stages of planning for actual implementation. Marin County, Oakland, Berkeley and Emeryville, as well as San Francisco have either established or are considering a target of 50% or more renewables for all customers within their service region by 2017. When achieved, such targets represent the single easiest way for municipalities to comply locally with whatever AB 32 stipulations may be imposed. Sierra Club urges ARB to make CCA a central part of its GHG reduction strategy in the near and medium term.
- Sierra Club is very pleased with the inclusion of the option of "a Feed-In Tariff for all RPS-eligible renewable energy facilities," but questions the phrase "up to 20 megawatts in size." We favor implementation of feed-in tariffs at once for all sizes of facilities. Feed-In Tariffs (FiTs) are efficient tools for speeding adoption of renewable electricity generation and stabilizing market prices of new technologies. Already used in more than 37 countries, and under consideration in Michigan, Minnesota, Illinois and Rhode Island, FiTs establish a price for renewables – guaranteed for 20 years or more – based on the cost of producing that electricity plus a fair profit. These rates usually have a

modest impact on customer bills compared to conventionally generated electricity. (In Germany, for example, the FiT cost to consumers equals the price of a loaf of bread per month.) FiTs allow manufacturers and renewable project developers to predict demand, and to invest with confidence. California should model its FiTs on those programs that have achieved significant growth of renewables. A FiT in California should be tied to meeting the state's goals for renewables. CARB should also recommend restructuring state law to allow more favorable renewable energy price structures.

- California Energy Commission's workshops on Feed-In Tariffs need to offer much more aggressive and comprehensive options, and CARB must prod CEC to do this.

- As the California Energy Commission's recommended in its 2007 Integrated Energy Policy Report, any carbon trading system should reduce allowances according to an appropriate evaluation of the effects of the renewable portfolio standard – in order to avoid oversupply of allowances.

- CARB should consider and address the full life cycle of emissions whenever possible. Currently, there appears to be an inconsistency across sectors. Transportation fuels take a full life cycle approach, but the energy sources for electric generation and end-use natural gas consumption do not. Unfortunately, the CPUC's interpretation of SB 1368 would allow about five million tons of GHG per year per Liquefied Natural Gas (LNG) terminal to go into the atmosphere without being "counted" as part of the state's carbon emissions, if these terminals are constructed. This is not an abstract issue, as we already face the likelihood of imported LNG increasing the carbon footprint of pipeline natural gas from Texas and Mexico. That is a loophole that should and must be closed: five million tons of GHG per year is roughly equivalent to the emissions of one million cars.

- Sierra Club urges CARB to ensure that electric power generators be held to an increasingly stringent carbon standard, and that the carbon standard be applied to all generators, whether under contract or utility owned, and to all types of retail sellers of electricity within the state.

- Sierra Club believes CARB's target of reducing coal generation 40%, or 13,000 gigawatt-hours, by 2020 is an achievable goal, provided that utility companies are held to the renewable energy and efficiency targets.

- Industrial boilers, oil refineries and glass manufacturing represent excellent opportunities to recover waste heat for electric generation and other purposes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 18:42:14

No Duplicates.





## **Comment 170 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on Low Carbon Fuel Standard  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

5. Low Carbon Fuel Standard (p. 46)

- We are looking forward to implementation of a Low Carbon Fuel Standard that accounts for all environmental impacts on a life cycle basis.
- However, we are disappointed that the Proposed Scoping Plan contains no explicit projections for carbon reductions from implementation of a rigorous Zero Emission Vehicle (ZEV) program. An ambitious ZEV program, plus plug-in hybrids, could achieve significant GHG savings.
- The plan should include specific requirements for automakers to sell hundreds of thousands of zero-emission vehicles annually by 2020.

Attachment:

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No Duplicates.

## Comment 171 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Joshua  
Last Name: Buswell  
Email Address: josh@forestethics.org  
Affiliation: ForestEthics

Subject: Commens on Forestry Section in Proposed Scoping Plan  
Comment:

Re: ForestEthics Comments on Proposed Scoping Plan

ForestEthics appreciates the opportunity to provide comments on the Proposed Scoping Plan (PSP) for meeting the goals of AB 32. We will be limiting our comments to the PSP's section on forestry.

We are grateful that the Air Resources Board (ARB) is including a section on forestry, as this is an often overlooked, but incredible important component toward meeting our state's commitment to solving the climate crisis. As is acknowledge in the scoping plan, deforestation accounts for 20% of global greenhouse gas emissions.

We believe the goal of maintaining the current 5 MMTCO<sub>2</sub>E is certainly doable and would urge ARB to set an even more robust target moving forward. We would also urge the following recommendations:

1). Shift the emphasis towards measuring average carbon stocks in a forest instead of rates of uptake and release. With limited funds, trying to account for the rate of carbon uptake or release is not the most judicious use of taxpayer dollars and is irrelevant. Rates of uptake and release are of less concern from a carbon perspective than the average amount of carbon the forests is storing. For example, if one cuts an old growth forest and replaces it with a sapling, there may be faster growth from the sapling after several years. However, the forest is still in a carbon deficit due to the logging of the old growth forest that had years and years of accumulated carbon. To emphasize throughout the PSP the rate at which California's forests are growing is less relevant than how much carbon these forests are maintaining on average. Until there is accurate accounting of average carbon stocks, ARB will not be able to tell whether California's forests are even meeting the goals of AB 32.

2). Reduce the PSP's emphasis on fire emissions. There is no question that communities should be protected from wildfires and studies by the Forest Service have shown that logging within 100 feet of a home to reduce fuel loads from brush and small trees can protect property. However, from a carbon perspective, the more important point is that focusing on fires once again puts the emphasis on rates of carbon release instead of overall carbon stores for unless the forested area never grows back, the carbon

will be reabsorbed. Additionally, just because a forest burns, even a high intensity fire does not translate into immediate and total carbon losses, and as the wood decays, rigorous post fire growth recovers much of the carbon that is lost.

3). Encourage and create incentives for landowners to produce multi-aged and diverse forests  
Appendix B says, "There are significant opportunities to increase the carbon storage on managed forest lands over the next few decades by increasing forest growth through healthy and fully stocked stands that utilize site potential for growth while resisting or minimizing emissions from fire, insects and disease." (C-169) There is no guarantee that vigorous tree growth will result in stands better able to withstand fire, insects and disease. In fact, the California Climate Change Center with staff from Berkeley and Cal EPA said of global warming, "Monodominant stands are at most risk. Designing diverse forest structures with multiple species where appropriate alleviates some risk associated with even-aged, single-species stands. A spatially mixed forests limits the spread of both pathogens and insects." The same study showed that pine plantations would also face a 31% reduction in yield due to global warming as compared to 18% for mature forest stands.

The science is also quite clear that certain logging methods release more carbon than others. For example, clearcutting releases more carbon than any other forest disturbance, including fire. Yet, the closest forest management prescription the PSP will make is encouraging "sustainable forestry practices." Indeed, where the PSP says, "Providing incentives to developing countries to help cut emissions by preserving standing forests, and to sequester additional carbon through the restoration and reforestation of degraded lands and forests and improved forest management practices, will be crucial in bringing those countries into the global climate protection effort," could no doubt apply to our own state as well.

4). Shift away from encouraging biomass until proper accounting is done that ensures it is carbon negative  
It may be possible that biomass may help to reduce carbon emissions, but there must be transparent and rigorous accounting that considers all elements of the energy production including transportation, milling, and logging before it is regarded a worthwhile solution.

5). Make sure reforestation and afforestation is scientifically sound.  
Reforestation and afforestation are important, but ARB must ensure credit is only given for genuine carbon reductions. For example, the science is far from clear that salvage logging and replanting post fire is a carbon benefit. To give credit carte blanche for such activities will not necessarily result in carbon gains.

We appreciate the opportunity to comment on this historic piece of legislation.

Joshua Buswell

Sierra Campaigner, ForestEthics  
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Attachment: [www.arb.ca.gov/lists/scopingpln08/661-comments-scoping\\_plan-forestethics.doc](http://www.arb.ca.gov/lists/scopingpln08/661-comments-scoping_plan-forestethics.doc)

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No Duplicates.

## Comment 172 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on Regional Transportation-Related GHG Targets  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

### 6. Regional Transportation-Related Greenhouse Gas Targets (p. 47)

- The Plan should do more than just "encourage" local city and county climate action plans. This planning should be required.
- This need not be an unfunded mandate: most cities lack funding and expertise to craft adequate climate plans. CARB should take the lead in devising incentives - carrots and sticks - and means of financially assisting or persuading cities to comply.
- The Plan should include stronger measures to reform land use planning in ways that reduce vehicle miles traveled (VMT). (See Newman and Kenworthy paper on how one passenger-mile of transit use can reduce 3-7 passenger-miles in a car.)
- Expand Regional Blueprints already underway. These should include transit-oriented development, walkable, bikeable communities, mixed land uses, requiring Regional Transportation Plans to have strong requirements for reduction of vehicle miles traveled and more.
- We are concerned with how this section of the Plan deals with land use measures. The Plan's land use goals are not ambitious enough. Targets are too modest. Tools identified to cope with the problem are inadequate. And serious reflection of public health, social and economic co-benefits of forceful action is lacking.
- SB 375 is insufficient by itself. Needed also are tools for local governments to translate GHG reduction targets into local action.
- The Plan only counts reducing 5 million metric tons (MMT) of carbon equivalent per annum by 2020 from actions in this sector. This is only about 3% of the total reductions. By comparison, the Sacramento Area Council of Governments (SACOG) blueprint could reduce carbon emissions by roughly 1 MMT by 2020, even though SACOG's region currently contains no more than 1/15th of California's population.
- An April 2007 Cal/EPA report, "Climate Action Team Proposed Early Actions to Mitigate Climate Change in California, Draft for Public Review," allotted 18 MMT by 2020 to "regional

transportation/smart growth land use measures."

The methodology CARB used to generate its current 5 MMT estimate is outdated and flawed.

? For a document as important as the AB 32 Scoping Plan, CARB should draw on the broadest possible range of studies and methodologies available to generate their estimate of reductions from the land use sector. Instead, they rely on a single study (The UC Berkeley report) to generate the 5 MMT estimate.

? The regional model simulations in the UC Berkeley report are widely acknowledged to understate the benefits of dense mixed-use development.

? Even the author of the UC Berkeley report criticizes the models in her study: "the results confirm that even improved calibrated travel models are likely to underestimate VKT [vehicle kilometers traveled] reductions from land use, transit, and pricing policies. These models simply are not suited for the policy analysis demands in the era of global climate change."

? Rather than basing their estimate on a single study, CARB should examine a more recent report from the authors of Growing Cooler, which suggests that reductions of 11-14 MMTs are possible by 2020 (The Ewing Report).

? Unlike the UC Berkeley report, the Ewing Report is based on actual historical data for a 20-year period exclusively from California. It is far more realistic in its projections than a series of regional modeling studies from different states and nations with widely differing circumstances (as included in the UC Berkeley report).

- More compact neighborhoods and less driving are the essence of the EIR for SACOG's Blueprint scenario. SACOG plans to devote much less land devoted to urban uses and to cut carbon emissions while saving farmland - providing public health and economic savings for households and businesses where less driving is required. Reduction of trips through good neighborhood design must be a CARB imperative from now on.

CARB must set a higher 2020 target for land use in order to put California on track for the 2050 target.

? We simply can't afford another 10 years of "business-as-usual" development. If CARB sets a low target for land use, the result may be 10 more years of sprawl. This will make it impossible to reach our 2050 target.

? For California to achieve its 2050 target, we must achieve VMT reductions of approximately 10% by 2020 and 20% by 2030. The current 5 MMT target equates to a 4% VMT reduction by 2020 - less than half of what is needed to keep California on track.

GHG Reductions from Land Conservation should be quantified and prioritized

? In addition to reducing VMT, smart growth also reduces greenhouse gas emissions by preserving landscapes that sequester carbon, such as forests, agricultural lands, and oak woodlands. CARB should establish guidelines for quantifying the emission reduction benefits of preserving these landscapes, and for mitigating the GHG emissions and loss of sequestration resulting from conversion.

? There are a number of possible mechanisms for implementing this strategy, including SB 375, CEQA, and Indirect Source Review.

? Many of California's carbon-capturing landscapes are outside of

regional transportation metropolitan planning organizations (MPOs), and therefore are not covered by SB 375. CARB should ensure that additional policy measures are adopted that apply to these rural counties.

? SB 375 and other land use measures should be coordinated with the Sustainable Forests measures to avoid duplicative efforts and maximize benefits in both sectors.

#### Smart Growth is Good for California's Economy

- Smart growth is a net economic benefit for California, according to a recent analysis by Stanford University's Jim Sweeney.
  - Californians want and need to live closer to jobs and public transportation choices - because smart growth will free them from high gas prices. The cost of driving a mile in the U.S. nearly doubled between 2002 and 2007.
  - The Sacramento Region (SACOG) estimates their smart growth blueprint will save \$16 billion in infrastructure costs by 2030.
  - Adopt and require the use of greenhouse performance standards, goals and metrics for transportation planning and projects. Hold state, regional and local agencies accountable for meeting these metrics.
  - Sierra Club recommends fast-tracking regional mass transit infrastructure, including Bus Rapid Transit programs (especially on existing freeway HOV lanes).
  - We suggest that mandatory employer parking cashout, like that implemented by the city of Santa Monica, be added as an additional measure to evaluate. Employer parking cashout rewards employees that opt for transit, carpooling, and other smart transit choices.
  - Many other ways to reduce workplace vehicle-miles-traveled (VMT), such as parking fee increases, telecommuting, etc. that need further study.
  - Sierra Club is pleased with the mention of public education about transportation.
  - We suggest that increasing public transit services (both bus and rail) be included among the sector-based methods.
  - Sierra Club supports CARB's consideration of Pay-As-You-Drive Auto Insurance. We note a recent study by Jason E. Bordoff and Pascal J. Noel, "Pay-As-You-Drive Auto Insurance: A Simple Way to Reduce Driving Related Harms and Increase Equity" ([www.brookings.edu/~media/Files/rc/papers/2008/0417\\_payd\\_bordoff/0417\\_payd\\_bordoff.pdf](http://www.brookings.edu/~media/Files/rc/papers/2008/0417_payd_bordoff/0417_payd_bordoff.pdf)).
- Applied to California, the analysis indicates much larger benefits than estimated in the Proposed Scoping Plan. This emission-reduction estimate is about ten times larger than the Plan states, and the Plan overlooks co-benefits such as congestion reductions, crash reductions and consumer benefits.
- Here are a few of the study's key findings. (The full paper will be posted on the Bookings Institution website shortly):
    - An 8 percent driving reduction for light-duty vehicles
    - VMT decrease by 24 billion miles
    - Less fuel consumption by 1.2 billion gallons, based on 2006 levels.
    - Direct annual CO2 reductions of 10.5 million metric tons

- Lower premiums for drivers; two-thirds of households would save money.

- CARB should adopt the Indirect Source Rule (ISR) for carbon dioxide.
- The indirect source rule, already in effect in the San Joaquin Valley for air pollution, is a proven policy tool that helps developers and planners calculate and mitigate the impacts of projects.
- ISR creates a local revenue fund to help local governments implement Climate Action Plans.
- Rural non-MPO counties are excluded from SB 375, so ISR would be the only tool that rural counties can use to address the GHG impacts of land use.

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.

As a means of encouraging green building, reducing energy use, and promoting good community design measures such as mixed use and walkability, such an ISR should follow the precedent set by the existing ISR to incorporate fee reductions for onsite GHG reduction measures. Remaining fees should be used for projects that reduce GHG as well as criteria pollutants and achieve other environmental co-benefits.

- Lawrence Frank's new study, *Reducing Global Warming and Air Pollution: The Role of Green Development in California* (July 1, 2008, prepared for Environmental Defense Fund), is very supportive of ISR. ISR is tested and effective.

- Allocation of State transportation funds: CARB can exert much more influence on local transportation planning than portrayed in the October Proposed Scoping Plan. All the local transportation agencies vie for State transportation funds. Make those funds contingent on reducing vehicle-miles and carbon dioxide emissions. Allocations should be weighted to strongly favor those local transportation agencies that have the highest population-adjusted reductions in carbon dioxide emissions.

- CARB should prioritize public transit funding:
  - The Plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion.
  - When transit is convenient and reliable, people choose to use it. When Bay Area residents both live and work within ½ mile of transit, 42% of them ride it to work.

- CARB should promote efforts to make transportation information available via cell phones. One low-cost innovation is the introduction of everything-on-cell-phone transportation info. Cell phones can coordinate and improve all our existing transportation equipment with:
  - Convenient access to bus and train schedules and next-bus or next-train real-time arrival times;
  - Automatic payment for train, bus, carpool, taxi, or rideshare (with demand-driven price adjustments honing in on the best price for minimum vehicle-miles);



- Carpools or rideshares scheduled weeks, days, hours, or minutes ahead, or even when a car is parked, or when a car with an empty space is driving by.
- Real-time ridesharing "buddy selection" (sometimes you want professional peers, sometimes church buddies, sometimes a muscleman for a tandem bicycle).

Innovative transportation funding mechanism:

- CARB needs to consider influencing the means of transportation funding. Consider the roller coaster ride of gasoline prices and transportation funding income over the past year. Add in the economic mess at both Federal and State level. California needs a transportation funding mechanism that provides an incentive to reduce vehicle miles and decrease carbon emissions. Such a funding mechanism makes it easier to influence regional planning.

- One suggestion is to consider auto insurance cost savings. Identify the total amount paid for vehicle insurance in a benchmark year. Then split the savings between government and drivers. For example, Californians (including businesses) paid about \$50 billion dollars for vehicle insurance in 2007. If government actions reduce vehicle-miles traveled (VMT) and accidents per vehicle-mile, the amount spent on vehicle insurance would decline. An overall savings of 10% on insurance could provide California \$2.5 billion for more innovative projects.

- For example, in 2008, an individual might have paid \$1,000 for car insurance plus \$250 in gasoline taxes (that help fund transportation infrastructure). In 2015, because people are using transit, rideshare, etc. to reduce total vehicle miles, the same individual might pay only \$900 for insurance (\$800 for the insurance company and \$100 for government transportation funding) and only \$150 in gasoline taxes (because of better fuel efficiency and 20% less vehicle-miles). In this example, the individual saves \$200 on his/her transportation costs while transportation funding remains the same \$250 per year per individual. However, much more of the \$250 can be spent on road and bridge maintenance, or buses and trains, since reduced vehicle-miles mean less funding is needed for new roads .

Public Toll Roads:

- Many experts are advocating tolls to replace fuel taxes. Los Angeles Metropolitan Transportation Authority plans to convert some high occupancy vehicle lanes to toll lanes in order to secure Federal grants. The problem with tolls is that government or private operators have an incentive to increase vehicle-miles in order to increase the total funds collected. Since private road owner-operators will be especially resistant to programs that reduce vehicle-miles, perhaps we should eliminate any private toll roads.

Attachment:

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No Duplicates.

## **Comment 173 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on Vehicle Efficiency, Goods Movement  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

### 7. Vehicle Efficiency Measures (p. 29)

- We support vehicle efficiency measures, such as fuel-efficient tire standards.

### 8. Goods Movement (p. 29)

- We support the ship electrification in ports approved by CARB in 2007.

- Requiring on-dock electric rail and electric drayage would eliminate all diesel emissions inside the port.

- We want to know more details of the Plan's proposed "Goods Movement Efficiency Measures - System-Wide Efficiency Improvements," which CARB has predicted will yield savings of 3.5 tons.

- CARB should work with state transportation agencies to plan commercially viable electric rail systems that would replace diesel trucks and trains. That move would also reduce congestion along California's highways, potentially lowering total vehicle emissions.

Attachment:

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## Comment 174 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comment on Solar Roofs, Heavy Vehicles, Industrial Emissions  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

9. Million Solar Roofs Program (p. 53)

- We support the Million Solar Roofs Program and its goal of 3,000 megawatts of solar energy for homes and businesses throughout the state by 2017. We note, however, that some reforms in program structure and funding may be necessary to achieve the goal.

10. Heavy/Medium-Duty Vehicles (p. 53)

- We support all three proposals for aerodynamic efficiency, hybridization, and engine efficiency.

- Sierra Club supports CARB's policies to reduce emissions from heavy-duty trucks with hybrid engine technology and other efficiency improvements. This could improve public health by reducing smog-forming pollution. Sierra Club urges quick action to address GHG pollution from heavy-duty trucks, reportedly scheduled for CARB's December 11 board hearing, when it will take up a measure to reduce emissions from tractor-trailers operating in California.

- We request that ARB consider requiring electrification of medium-duty delivery trucks, as well as other means to reduce emissions in this sector.

11. Industrial Emissions (p. 56)

- We support CARB's plan to require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits.

- California's industries (and CARB) could learn from Japan. "According to the International Energy Agency, based in Paris, Japan consumed half as much energy per dollar worth of economic activity as the European Union or the United States, and one-eighth as much as China and India in 2005." (NY Times, July 4, 2008)

- High efficiency co-generation needs to be required for all appropriate new energy installations.

Attachment:

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## **Comment 175 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on High Speed Rail  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

12. High Speed Rail (p. 56)

- Sierra Club endorsed Proposition 1A and supports construction of a High Speed Rail system for California.
- CARB is aware of the ongoing controversy over Altamont and Pacheco Pass routes. We urge CARB to advise the High Speed Rail Authority on the relative carbon footprints of competing routes into the Bay Area, and to assess the relative degrees of cost-effectiveness in reducing carbon when constructed. To the extent that CARB can bring to bear climate considerations and data on this choice, the public will be well served.

Attachment:

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## Comment 176 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on Green Building Strategy  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

13. Green Building Strategy (p. 57)

- Industry evidence indicates a disquieting fact: in so-called "green" buildings, we are not getting advertised energy conservation results owing to improper installation of energy saving features like insulation, framing and lighting. Poorly installed batt-type installation can reduce energy reductions as much as 80%. With improper installation, air leaks occur in the house or building envelope so hot or cold air enters freely, thus negating any energy savings in cooling or heating designed in the plans. Some solar panels are poorly placed. Some reported test data show that supposedly "green" buildings actually use more energy once in operation than a well-built regular structure.
- Apparently, many contractors don't train employees or give them the time on the job to carefully check their work, nor do building inspectors find these problems. More critical is the construction industry in general is not "Performance Based." For example, a building can get "green" status without ever proving if it is indeed saving energy. Without feedback, the contractors and inspectors don't learn, and the architects never learn if their plans are actually successful in saving energy.
- The solution is requiring verification of building performance before occupancy. In addition, a building could get a temporary green building certification but it would not be final until several years of energy data are collected to prove that the energy reductions are actually being achieved. Contractors need to train their regular employees plus have a well-trained supervisor carefully watching their day labor force implement correct techniques. Building inspectors need to be trained, and they need to enforce proper construction at every step of the project and on every building in a project. Awarding any state-level green building certification should be conditional on demonstrated efficiency.

Absent from the Scoping Plan is a discussion of existing community preservation and historic preservation. While green building is critical for new construction, it should not be used as an excuse to tear down historic buildings or existing communities. Recognition of community preservation and related historic preservation should be a part of all landuse decisions. Since demolition comprises a significant portion of waste generated in

California, community preservation is the source reduction part of development. Adaptive reuse of buildings either in place or by relocation should be discussed either in the Green Building section or under landuse as well as linked to the Recycling and Waste section.

Attachment:

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## Comment 177 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on Recycling and Waste  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

14. Recycling and Waste (p. 62-63 and Vol. 1 Supporting Documents and Measure Detail p. C-158 to C-164)

While significantly improved from the first version, CARB's scoping plan should highlight even more aggressively the powerful carbon reduction potential of zero waste and extended producer responsibility: first, reducing waste by design in manufacturing process, then reusing, recycling or composting products. We suggest that the findings of the new report "Stop Trashing the Climate," released June 5, 2008, (<http://www.stoptrashingtheclimate.org/>) be considered for the Scoping Plan. The report, by GAIA with the Institute for Self Reliance and Eco-Cycle, brings together information about recycling, plus source reduction, reuse and composting. Further, it describes how scaling up recycling, reusing materials and products, and shrinking the size of a community's waste stream can greatly reduce greenhouse gas generation and related climate damage:

"Incinerators and landfills are relics of an unsustainable past that have no place in our green economy. The report, "Stop Trashing the Climate" shows that zero waste -- that is, preventing waste and strengthening recycling and composting -- is one of the fastest, cheapest and most effective strategies for confronting global warming."  
Carl Pope, Executive Director, Sierra Club

While it is commendable that Californians are recycling as much as they are, the statement that existing diversion rate from landfills is 54 percent is a misleading statistic. The critical statistic is how much is landfilled today as compared to the 1990 base year. When the current disposal tonnages are used, Californians will see that they are landfilling almost the same amount today as they did then. Per capita waste disposal is down but we are still wasting huge amount of raw materials. Using the true disposal figures shows that there is huge opportunity to both reduce what we generate and increase what we compost, reuse and recycle.

ETAAC submitted to CARB an excellent set of recommendations for the waste sector but only some were included in the Plan. We strongly urge CARB to include ALL the ETAAC recommendations for the waste sector.

We believe there are many more tons of carbon reductions possible from aggressive zero waste and extended producer responsibility

programs. Our top improvements to the Plan are:

1. Mandate the collection of commercial recycling which can be phased in by commodity starting with corrugated containers and other paper, organics, metals and then specific plastics.
2. Stop the use of alternate daily cover (ADC) made from compostable material as this increases the chance of methane generation and release, and eliminate recycling credit given for ADC.
3. Aggressively work to site more composting operations and complete all needed studies to resolve the issues of VOCs from composting.
4. Support the EPR Framework legislation and once signed into law, work quickly to implement the law.
5. Move cautiously in any action that might increase methane from open or closed landfills as any action to increase energy development from landfills may actually increase fugitive releases of methane and other VOCs into the atmosphere. The Precautionary Principle should be used in any action regarding landfill gases.
6. Use current disposal tonnages rather than diversion tonnages as the final arbiter of success.

Inclusion of specific measures for these actions with emission reduction numbers and deadlines should be attached to each action.

#### Landfill Issues - Organic Wastes, Alternate Daily Cover and Methane Generation and Collection

Landfill waste disposal should be phased out by requiring recycling and making manufacturers responsible for the end-of-life disposition of their products. Wastes should be separated, particularly organic wastes, for effective composting and to reduce the risk of generating methane. CARB should explicitly reject carbon credits for landfill carbon sequestration. Alternative Daily Cover (ADC) that uses green waste or wood waste should not be given recycling credits or counted as recycling. This actually de-incentivizes diversion of green waste into composting and methane energy capture.

While CARB's plan supports separation of organic and compostable materials CARB's suggestion to capture and utilize landfill methane gas should not be construed as support for continued dumping of green waste into landfills. Landfill capture of methane is far less efficient than what is possible with green waste separation. This is especially crucial given that methane is a far more potent greenhouse gas than carbon dioxide. Some research shows that attempts to capture and convert landfill gas to energy (LFGTE) actually can cause more emissions than just flaring the gas under certain conditions. In addition, the common assumption that "the majority of methane gas that escapes the landfill can be flared and converted to CO<sub>2</sub>" may not be valid in many cases. A common default or "blanket" assumption that 75 percent landfill gas collection rate may be invalid and is under review by CARB. The International Panel on Climate Change (IPCC) states that some landfill sites may have less efficient or only partial gas extraction systems, and there are fugitive emissions from landfilled waste prior to and after the implementation of active gas extraction; therefore estimates of lifetime recovery efficiencies may be as low as 20%." The International Council for Local Environmental Initiatives agrees with the IPCC: "a default estimate of the recovery efficiency should be 20%."

To operate LFGTE economically, landfill operators must increase the concentration of methane in landfill gas significantly while degrading the efficiency of gas collection systems by leaving the cap off longer, replacing vertical collection wells with flexible horizontal pipes, and decreasing vacuum pressure. This may result in increasing net overall GHG emissions, instead of reducing them.

CARB's underlying assumption is that methane gas has a global warming factor of 21 (i.e. 21 times more potent than CO<sub>2</sub>). But that is the relative harm over 100 years. The short-term harm (important when considering the tipping point when global warming reaches a point of no return) is much greater. Over a 10-20-year period, it is estimated that the relative harm of methane gas is 72-90 times greater than CO<sub>2</sub> due to methane's unique properties. All this indicates CARB should exercise considerable caution in making LFGTE assumptions and recommendations.

#### High Recycling / Zero Waste and Market Development

- CARB's plan should stipulate mandatory commercial recycling (even with recycling markets at their current bottom, because credit problems are the issue, not lack of markets). Infrastructure exists in California to handle all the materials collected, and in most cases, mandatory commercial recycling will not require local governments to modify existing collection contracts. It should require the state to mandate collection or ban the landfilling of paper, metal and certain plastics, as well as green waste.

It has been almost twenty years since California signed AB 939 into law. Since that time, businesses and institutions have had ample time to implement commercial recycling, and yet these sectors still generate more than half of what is disposed of in our landfills. The time for voluntary action is over. CARB needs to show the political will to truly reduce greenhouse gases by mandating commercial recycling for all materials where even negative value markets exist.

Composting, reuse and recycling facilities should be included in local government critical infrastructure plans along with water and sewage treatment plants. All are necessary for a community to be sustainable. In many cases regional compost, reuse and recycling facilities are an alternative to each community having their own set of zero waste operations. However, cities should be encouraged to locate facilities close to the point of generation, especially composting operations, so as to reduce transportation-related energy consumption and to allow residents and businesses to use their own compost locally rather than shipping in finished compost. We encourage cities to landbank for critical infrastructure projects like compost facilities.

- We propose statewide installation of "Resource Recovery Parks" to include facilities for reusing, recycling, composting, and minimizing the discarding of materials. They can also incorporate facilities for repair services, retail sales of reclaimed products and landscaping supplies, organically composted gardens, educational tours, and public amenities. Such a model park currently operates in the city of Marina in Monterey County.

- Fees collected from the sale of carbon credits or other greenhouse reduction financial mechanisms should be made available

in the form of grants, loans or tax credits to private or public composting and reuse or recycling manufacturing facilities.

- Successful Zero Waste initiatives require effective outreach and educational programs. CARB should utilize the legions of young people who are not only are enthusiastic and care about waste reduction, recycling and global warming but are also willing to go out and do something about it. CARB should aid these individuals in helping educate our communities about the issue. Recycling ambassador programs throughout state and local government agencies should be instituted so that students and other volunteers can go door-to-door educating residents about the need for and the benefits of recycling. In addition, new home owners, apartment dwellers and other residents should receive information after moving to a new residence that explains to them the recycling policies in their neighborhood and encourages them to do so. People are willing to do what it takes to pitch in, but if they have no idea how to do it, they won't even begin. This type of outreach should be a critical aspect of the CARB plan.

- Government purchasing power is very powerful. Along with existing Environmentally Preferred Programs, a new program discouraging the purchase of single use disposable items and encouraging refillables and reusables needs to be implemented.

- CARB is to be commended for stipulating "lifecycle tracking" of manufactured products, giving priority to reusables and locally manufactured items.

#### Conversion Technology

Sierra Club Policy does not support incineration of mixed solid waste. The Club is reviewing options of recovering energy from source-separated parts of the solid waste stream, e.g., restaurant cooking oil, sewage sludge, and food waste. However, burning or converting a material to a different state can require more energy than the energy recovered. Further, conversion technology facilities require significant investments of funds, public and private and dedicated waste streams and can discourage the development of reuse or recycled markets for those same materials. Developing new products from waste materials creates more jobs than burning or "converting" those materials. So like landfill gas, we recommend the use of the Precautionary Principle before embarking on new conversion facility development.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 19:07:38

No Duplicates.

## Comment 178 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on Sustainable Forests  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

15. Sustainable Forests (p. 27)

- The forest sector can play an important role in sequestering carbon from the atmosphere, but the targets outlined in the scoping plan continue to be quite weak. We encourage ARB to revisit the targets as data improves, and re-evaluate whether a more aggressive target is appropriate.
  - While there will inevitably be a role for the California Department of Forestry, the Board of Forestry, and the Resources Agency in developing regulations and conservation strategies for the forest sector, it is imperative that the ARB retain a clear leadership role in evaluation of the standards, the certainty of potential emission reductions, and the consistency of the inventory and accounting.
  - Any perceived reduction in potential wildfire-related emissions attributed to fuels reduction activities should be considered highly speculative and should not be used to reach the 5MMTCO2E target. While fuels reduction actions in certain locations, such as near homes and communities, may be a public safety priority, it is not at all clear that there is a net savings of carbon emissions associated with these activities.
- To the extent that there is an increased focus on using forest biomass to generate electricity, it is important that biomass utilization not lead to adverse forest management practices. It makes sense to utilize the material created from community protection efforts, or incidental to an otherwise lawful harvest, but we should not allow biomass production to impact important habitat areas, including riparian areas, late seral forests, or other sensitive habitats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 19:10:37

No Duplicates.

## Comment 179 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Winona

Last Name: Azure

Email Address: winonx@comcast.net

Affiliation:

Subject: California's Chance to Lead and Remediate Climate Change

Comment:

Dear Air Resources Board,

Thank you for your innovative and bold Scoping Plan that addresses a range of solutions for real-world climate change action. There were some points of concern and suggestions that I wanted to share, in hopes to contribute to the community efforts of Californians in reducing carbon emissions, for it will take everyone on board for the implementation and success of AB 32.

1. The Scoping Plan says it will reduce carbon intensity of California's transportation fuels by at least 10% by 2020. I find this unusually low considering the United States already had a goal as of 2006 to reduce carbon intensity 18% by 2012. As stated in the Fact Sheet: Earth Day 2007 (a white house document): <http://www.whitehouse.gov/news/releases/2007/04/20070420-9.html>

2. I did not understand the reasons for making a "transition" to auctioning of cap-and-trade permits. Let's not forget what Europe learned after they mistakenly gave all their permits away, essentially billions in free money to corporations to spend as they wished. These caps are more valuable than we know, especially down the line once the caps acquire more pressure in time and rise in value. The state can use the money from the auctions to support greater infrastructure like increased power lines from renewable sources to cities and towns or as incentives to consumers in the mentioned feebate programs.

3. The 49% allowance of offsets seems high, considering out-of-state offsets are permitted. Since California is leading the way (amongst a few other states) with implementing cap-and-trade and energy and transportation efficiencies, I am concerned that states that join this carbon reducing bandwagon late in the game might have offset properties or natural resources within their own state already used by California businesses. A 49% reliance on offsets might work for the short term until financial means and technological advances help ease carbon reductions, but ultimately they could give excuses to businesses not to comply with, adopt, or fund research into carbon reducing technologies. Consumers, who contribute the majority of carbon emissions through automobile use, are reliant upon businesses for more fuel-efficient cars, since not everyone can bike or walk or take public transit to where they need to go. If businesses get too many breaks, what incentives will they have to work harder and faster towards better technologies? If all businesses are doing it, others will need to be competitive to survive, so let's make sure the law is clear with what is expected from them in a way that does not permit leakage. In a sense,

offsets are leakages if they put the burden off on other states, forcing them to preserve forestland, etc. that could be better preserved for their own means. I would at least strongly recommend to set target dates to gradually reduce the percentages of offsets, with offsets in other states counting half as much as offsets within our own state of California, for instance.

4. There also needs to be greater accountability with utilities in reporting their % of renewables. I work with greenhouse gas inventories for a university in California. In collaboration with other universities, our local electric provider PG&E says they use 20% renewables. I found out at a conference on sustainability that that is an incorrect number (a PG&E representative was confronted publically and admitted the truth); it is actually only 11%. Yet every university is reporting 20% from them to the California Climate Change Registry. That is a big discrepancy. There needs to be a law that fines them for presenting inaccurate information, since ultimately the atmosphere cannot be lied to. If they can do it (and are doing it) what prevents other businesses from doing it?

5. There were no specifics in regards to composting programs for commercial and residential, merely a mention of initiatives to encourage increased collections. Incentives were mentioned, but only in terms of exploration. Nothing about mandates or tonnage targets were outlined.

6. The mention of water resources and plans to conserve, recycle, and promote system efficiencies sounds positive, but there is no mention of how the water distributions will change as a result of population growth. Arizona has dealt with this high-pressure situation by making a law that prohibits water use for landscaping and some agriculture. They converted their recreational areas back to a desert landscape that is self-sustaining. Southern California faces this same dilemma since they pull much of their water from much wetter exotic lands further North and out-of-state. This section needs serious work if we are to decrease the massive uphill pumping of water from Northern California to Southern. A region should not be allowed to live beyond their means and development should slow drastically for this reason.

Thank you for allowing commentary and feedback on this plan to reduce carbon emissions! California has a huge global responsibility since we are the 15th largest contributor of carbon emissions worldwide, and I'm proud to be a citizen of a state that is taking climate change seriously.

Sincerely,

Winona Azure  
GHG Inventory Coordinator  
University of California, San Francisco  
415-306-3899  
winona.azure@ucsf.edu

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 19:12:44

No Duplicates.



## Comment 180 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comment on Water

Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

16. Water (p. 65)

- We support a public goods charge for funding investments in water efficiency that will lead to reductions in greenhouse gases.
- We are pleased that CARB staff calls for a 20% reduction in water use, but disappointed that agricultural water use is not included among the efficiency targets. Agricultural water use accounts for more than three quarters of the state's total water use.
- Moving, treating, heating, and desalting water consumes energy. Producing energy consumes water. Some innovative ideas to reduce water consumption:

- Installation of smart water meters:

Install smart radio protocol meters (aka Advanced Metering Infrastructure (AMI)) and an associated remotely adjustable pressure reduction valve to municipal and industrial water users and similarly smart meters with appropriate transmission technology to agriculture. AMI allows leak detection and can also provide the same differentiation between domestic and irrigation water use as two separate meters. Single-family dwelling water price could depend on water use. The associated valves could be authorized by customers to reduce the pressure, should they be at risk of excessive use of water for the month (financial penalty). (A phone call or web entry would allow customers to draw on "rollover" or "banked" gallons or even to "sell" their banked gallons to others.)

The smart water meters could communicate with the smart electric and smart gas meters to quickly calculate the actual energy savings of a solar hot water heater. The pair could automatically adjust the energy savings for a change in family size causing a change in water use.

Local water agencies may conserve on water storage infrastructure with the AMI meters. Should the agency's water be needed to fight a fire or should a pipe failure or earthquake interrupt supply, the agency can ration water use. For example, if calculations suggest homes need to reduce use to 100 gallons per day, the agency can turn off the water for each home when the home use reaches 100 gallons each day.

Ask the California State Water Resources Board, the Public Utilities Commission, and the California Air Resources Board to coordinate. Southern California Edison is installing AMI to relay

real-time data and possibly control use. Local water agencies could contract with or coordinate with electric utilities to relay water use and control-valve communications.

- Implement "Pay as You Save" utility programs for water conservation, too:

By including water savings in "pay as you save" programs, utilities could provide energy efficient appliances, solar water heaters, insulation, solar energy systems, co-generation furnace replacements, long-haul tractor conversions to electric-natural gas hybrids etc. Utility customers would pay for the equipment over time, via their utility bills with no up-front payment, no debt obligation, no credit checks, and no liens needed. Utilities can guarantee that the customers' monthly utility bills will be less than before the installation of the energy and water saving technologies. Because the arrangement is attached to a property and not a person, even renters can benefit.

- Include greenhouse gas emissions credits for water savings: Allow greenhouse gas emissions credits for the water purveyor based on a calculation that includes greenhouse gas emissions from the customer's side of the water meter.

Attachment:

Original File Name:

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No Duplicates.

## Comment 181 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comment on Agriculture

Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

17. Agriculture (p. 66)

- Sierra Club remains extremely disappointed with the Plan's low expectations for agriculture. The initial Plan only mentioned 1 potential MMT equivalent of GHG reduction from methane capture at large dairies while the state's GHG inventory shows 13 MMT equivalent of methane emissions from manure management and enteric fermentation. Agriculture contributes about half of California's methane emissions, but is far from contributing its share of reductions under the current Plan. This is especially serious considering that conventional models of methane underestimate its effect. The CEC's inventory used a GWP of 21, revised upward from the early figure of only 11. The figure used by CEC lags behind current science, as the newest figures show a 100-year GWP of 25. However, there are major questions around using a 100-year GWP when CH<sub>4</sub> is only resident in the atmosphere for about 8 years. The 20-year GWP, which has currently been upgraded to over 70, would be more appropriate. If a 20-year GWP is applied, methane would be seen to contribute 17% of the state's greenhouse gas impact rather than the "official" 2004 figure of 5.7%. If shorter term timeframes are examined, which match the 8 year residency of methane, then the role of methane would be much greater. In addition, one NASA scientist has evidence that methane may be twice as powerful as IPCC assumes. Thus, methane may represent even more of a threat in human induced global warming. The flip side is that its short residence in the atmosphere may also represent a great opportunity to lower GHGs rapidly. This could be amplified by the fact that, unlike carbon emissions, the vast majority of anthropogenic methane emissions can apparently be rapidly absorbed by sinks. Tackling the global methane problem—compared to CO<sub>2</sub>— is thus a relatively rapidly achievable goal, and a state like California could contribute disproportionate benefits that might have truly global significance.

- Studies have shown significant methane emissions from bovine digestion, which raises the question of whether a carbon tax should be applied to dairy products, such as beef and milk.

- In Department of Conservation's study of greenhouse gas emissions associated with conversion of agricultural land to urban uses, both direct and indirect emissions should be considered. Promoting more compact, efficient, transit-oriented urban development will not only reduce greenhouse gas emissions from

vehicle travel but also conserve agricultural land by minimizing conversion to urban use.

- The Plan should reference and encourage CDFA's development of a strategic plan for agriculture. Efforts to minimize conversion of prime farmland will be helped if agricultural enterprises now on the land maintain profitability and sustainability.

- The Plan should emphasize that linking good land use with local food systems can reduce transportation-related emissions, provide a premium for farmers selling locally, and even improve access to healthier foods.

- State and local governments could increase access to local foods, for example, by direct investments, incentives and public-private partnerships to develop needed local foods system infrastructure.

- Joint action by the Department of Food & Agriculture and CARB could significantly increase the amount of locally produced food consumed in the state - thus reducing more emissions from transportation. CDFA and CARB could work together to track and measure "food miles traveled" and seek ways to cut distances from food to producer. Cutting down on transport of agricultural products from agriculture areas to other parts of the state would lessen GHG.

- The Plan should address urban agricultural issues, such as:

a) What funding can the state supply to assist municipalities in supporting urban agriculture?

b) What focus can CARB bring on removing barriers to urban agriculture? CARB and CDFA could work together to: find useable land for community gardens, inventories of such land; test for toxicity; reach out to potential urban gardeners; recast city regulations in favor of urban orchards, edible landscaping, local composting, and rooftop gardens; and provide more UC Master Gardener training and technical assistance?

c) Could CARB facilitate funding of local offices in each municipality to inventory potentially available state-owned lands and mobilize local community gardeners and organizers?

- Many studies by California scientists and others throughout the world have shown how organically grown crops have significantly lowered GHG emissions, from non-use of nitrate fertilizers, retention of carbon in soils, and other means.

- The Plan needs to highlight the greenhouse gas reduction benefits of organic agriculture. The California Energy Commission Climate Change Research Conference Sacramento, September 10-13, 2007 has five presentations:

[http://www.climatechange.ca.gov/events/2007\\_conference/presentations/index.htm](http://www.climatechange.ca.gov/events/2007_conference/presentations/index.htm)  
1

- Data from The Rodale Institute's long-running comparison of organic and conventional cropping systems confirm that organic methods are far more effective at removing the greenhouse gas, carbon dioxide, from the atmosphere and fixing it as beneficial organic matter in the soil. See Laura Sayre, 2003  
[http://www.newfarm.org/depts/NFfield\\_trials/1003/carbonsequest.shtml](http://www.newfarm.org/depts/NFfield_trials/1003/carbonsequest.shtml)

-- Another study shows confirmed ecological virtues of organic farming  
[www.pnas.org/cgi/reprint/103/12/4522.pdf](http://www.pnas.org/cgi/reprint/103/12/4522.pdf)  
<http://news-service.stanford.edu/pr/2006/pr-organics-030806.html>

Attachment:

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No Duplicates.

## Comment 182 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comment on Public Health and Environmental Justice  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

D. Public Health and Environmental Justice Issues Must Be Addressed

- ? The Proposed Scoping Plan has failed to adequately respond to concerns raised by the EJAC and public health community.
- ? CARB should adopt the EJAC's recommendations to increase the 2020 target for land use, invest in public transit in low-income communities, and create incentives for local governments to reduce their emissions.
- ? The public health analysis should include specific data about public health impacts associated with community design, including impacts on obesity, chronic disease and public safety.
- ? CARB should ensure that the public health community has an ongoing, formal role in shaping AB 32 policy.

Sierra Club supports the following text recommended for insertion into the Plan by the Coalition for Clean Air and other California organizations.

- ARB will adopt a cumulative impacts assessment method within a year or prior to the adoption of AB 32 related market-based regulation and identify communities "already impacted by air pollution" cumulatively to ensure uniformity and consistency among the state, air districts and other local governments so that communities identified as impacted by one agency do not get categorized differently by another;
- ARB will evaluate the potential negative impacts (if any) of all subsequent AB 32 regulations in these communities prior to their adoption and incorporate safeguards;
- ARB will design the market mechanism compliance protocols to achieve maximum emission reduction and co-benefits in the most disadvantaged communities by including incentives and restrictions; and
- ARB will initiate a public process within three months to determine and recommend the percentage of resources generated through AB 32 related auction and fee revenues that can be directed to assist in adaptation and emission reduction measures for those communities and small businesses most disadvantaged by climate change or air pollution impacts.

Attachment:

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No Duplicates.

## **Comment 183 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Steve

Last Name: Birdlebough

Email Address: affirm@friendshouse.org

Affiliation: Friends of SMARTransit

Subject: Climate Protection Scoping Plan

Comment:

I have been involved in air quality issues as a volunteer since 1970, and commend the CARB Board for taking a generally aggressive environmental protection stance. We are relying on you to adopt far-reaching measures to slow global warming and achieve progressive reductions in smog and other dangerous air pollutants that cause illness and death.

Sonoma County has adopted goals for greenhouse gas reduction that are very demanding. We need your help to establish state standards that reinforce these local efforts, and set an example for the Federal Government as well as for other nations. Communities throughout California are already facing a public. I also urge the state air board to include a stronger focus on measures to reduce emissions from driving that make up 60% of greenhouse gases here in the North Bay. Please include a much more aggressive statewide goal for reducing vehicle trips, as well as measures that encourage more aggressive VMT reduction actions by all local governments. Also, focus on other regulatory measures to cut GHG emissions from industrial sources such as petroleum refineries and cement plants.

The plan needs to show that taken together the proposed measures will make rapid progress toward reducing greenhouse gases as it protects vulnerable individuals and communities from pollution hazards.

Thank you for your efforts to strengthen the AB 32 draft scoping plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 19:20:17

No Duplicates.



## Comment 184 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comment on Voluntary Actions, Allowances and Revenues, and Evaluations

Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

E. VOLUNTARY EARLY ACTIONS AND REDUCTIONS (p. 67)

- Sierra Club is pleased CARB is studying means to reward voluntary early actions reductions.

F. USE OF ALLOWANCES AND REVENUES (p. 69)

- We support most of the uses listed, particularly those related to environmental justice, such as "achieving environmental co-benefits." However, we are not supportive of "direct refund to consumers," unless such "refunds" can be tied directly to GHG reductions.

- Criteria and toxic air pollutants create health risks, and some communities bear a disproportionate burden from air pollution. We support ideas that benefit these unfairly impacted communities.

- Revenues should be prioritized for projects that reduce both GHG emissions and also provide reductions in air and other pollutants that affect public health.

- We are pleased that CARB has provided a positive discussion of carbon fees. We think that the range of \$10 and \$50/ton would be reasonable; this fee could start low and gradually increase over time as needed.

- A \$30-per-ton fee on all greenhouse gases would provide revenue of approximately \$12 billion per year, which is less than 1/100th of the California economy. This money could be restored immediately to the state economy, encouraging local investment in clean technologies and green jobs, activities with a bright prospect in a carbon-constrained world. Revenues could also provide rebates for low-income consumers.

- We believe that it should be possible to quantify some of the benefits from the expenditure of the funds on projects that provide considerable GHG emission reductions. For example, transit operators know increased frequency of service and lower fares can increase ridership. Recovering waste heat, either to generate electricity or from generating electricity, has specific value to

commercial and residential utility customers.

- On carbon pricing, emissions fees should be analyzed along with a cap-and-auction system, as the Plan proposes. We need the income to fund CO2 reductions.

- Polluters always should have to pay for cleaning up the damage they cause. Therefore, if a carbon market is established, all emission allowances should be auctioned. The Plan states (page 16), "These allowances could be freely distributed to capped firms or auctioned in the trading market." We are opposed to free distribution of allowances, since they don't encourage accountability and provide much less motivation to reduce GHG emissions.

- Major emitters should pay for the cost of administering this program.

### III. EVALUATIONS (p. 73)

Specific economic benefits of energy efficiency and clean energy measures can be evaluated based upon the sum of:

- 1) Projected and avoided costs for these energy supplies,
- 2) In-state jobs and manufacturing due to green economic activity,
- 3) Federal tax credits benefits and in-state tax revenues,
- 4) Export revenues, and
- 5) Environmental and public health benefits.

- CARB's analysis of public health benefits of transportation efficiency measures focuses only on respiratory medicine and economic benefits of reducing respiratory disease. While this analysis provides powerful support for the Plan's vehicle and fuel improvements, the Plan overlooks large public health benefits to other transportation efficiency measures not in the Plan.

- Public health perils such as obesity, diabetes and heart disease can be reduced by strategies the Plan should embrace more aggressively. Auto-dependent neighborhoods make these diseases more common; smart growth and reduced vehicle miles traveled can help combat them.

- CARB's public health analysis needs to address the issue of food security and "healthy food deserts." Lacking local healthy food choices, many people must travel long distances to obtain more healthy fare or rely on expensive, locally available junk food. Although emissions benefits of better access to healthy food may be modest, public health benefits can be significant and climate change policy offers a chance for low-income "food deserts" to get attention.

Attachment:

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## **Comment 185 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Sierra Club Comment on Implementation, Personal Action, Outreach  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

IV. IMPLEMENTATION: Putting the Plan into Action (p. 99)

A. Personal Action (p. 100)

Sierra Club is pleased that the Proposed Scoping Plan includes Personal Action as an important strategy for curbing GHG emissions. It calls for the "active participation of the people of California" including "the voluntary commitment and involvement of millions of individuals and households."

To encourage this voluntary commitment and involvement, we propose that CARB track on the Internet the effect of individual and family actions on lowering greenhouse gas emissions. A statewide electronic registry could record the results of their actions and report back via graphics and numbers the mounting total of emissions curbed.

Without such a measurement, individuals and families will lower their carbon footprint alone, receiving little or no feedback.

However, if they anticipate positive feedback, people will be much more likely to act. They will know for sure that their actions are having a positive effect. Knowing they've made a concrete contribution will motivate them to do even more, and to urge their friends and family to participate. This approach would also utilize the latest motivational research, which indicates that if people believe "everybody is doing it," they are much more likely to do it.

By providing evidence of the effectiveness of individual actions, a public electronic measurement would furnish a way to turn fear of the effects of global warming into positive action. It will help eliminate feelings of helplessness in the face of a global problem.

Public measurement of voluntary actions would also draw individuals and families into the overall effort that CARB proposes in the Scoping Plan. Their experience will give them the feeling of "buying in." That will build their interest in learning about and supporting CARB's efforts and those of industry, transportation, agriculture, and other sectors. By feeling part of a community statewide effort, they would become interested in and supportive of

the steps being taken in other sectors - for example, government land use changes to reduce vehicle travel, etc.

Technology exists that would allow individuals and families who choose some of the actions recommended by CARB to receive positive feedback on their actions.

CARB should create a website where individuals and families could record the changes they're making in home insulation, windows, appliances, roof color, shading, compact fluorescents, recycling, reducing vehicle travel, and other emissions-curbing activities. Statewide tallies exist of some of these measures taken by large commercial installations. A tally of personal individual and family measures taken could also be created. A mountain of data on individual solar (PV and DHW) installations already exists.

Lucid Design Group for example, a California company, provides buildings with an interactive website and touch-screen kiosk display that makes resource use of energy, saving of money, and offset of emissions visible and easily understandable. That technology might be adapted for use in tracking individual and family contributions.

Furthermore, tracking progress in curbing individual or family emissions would be fun, like following a sports team. It will be like checking the stock market, except that this measure will always go up. It will give families a game to play

CARB should put in staff time to develop this project. Private partners might be interested in developing appropriate technology and a business model.

Watching the numbers or a thermometer-like graphic rise by logging on to a public website would create a sense of the community pulling together. We shouldn't underestimate the power of such feelings. People have yearnings to take part in idealistic national efforts and the feelings of solidarity such efforts create can be strong. Think of everyone pulling together in World War II and the public enthusiasm for and interest in the 2008 presidential election. Surely there's no statewide effort healthier or more universally beneficial than saving energy, switching to renewables and reducing vehicle travel.

We would feel like we're all in this together - which we are.

#### B. Public Outreach and Education (p. 100)

- All four strategies are excellent.
- Funding is needed for training teachers in the climate change curriculum.
- The Plan should include detailed public awareness campaigns, with budgets (funded by carbon fees), that will be used to involve the public in all aspects of the Plan.
- Successful implementation of California's historic global warming law will require a program that is open and transparent to the public, including performance and compliance tracking information of all components accessible via the Internet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 19:25:46

No Duplicates.

## **Comment 186 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation: Sierra Club California

Subject: Sierra Club Comment on Enforcement, Permitting, Funding, Future Vision  
Comment:

COMMENTS ON AB 32 PROPOSED SCOPING PLAN,  
SUBMITTED BY SIERRA CLUB CALIFORNIA, November 19, 2008

E. Enforcement (p. 109)

- Sierra Club agrees that enforcement is a critical component of AB 32 implementation. CARB will need to significantly bulk up its enforcement resources to meet this challenge. In addition, the scoping plan should explain the route for enforcing emission reduction measures taken by other agencies outside CARB to hold those agencies accountable for assuring the realization of emission reduction measures assigned to them.

- We support the measures proposed for enforcement, especially including engaging local Air Quality Districts in tracking emissions from local facilities.

- We would support allocating some program funding to these Air Quality Districts to support their increased duties under AB 32.

F. State and Local Permitting Considerations (p. 110)

- We support including state and local permitting considerations in the AB 32 implementation strategies.

- We would support allocating some program funding to the entities involved to support their increased duties under AB 32.

G. Role of Local Air Districts (p. 111)

- Sierra Club would support allocating some program funding to Air Quality Districts to support their increased duties under AB 32.

H. Program Funding (p. 112)

- We support the measures proposed for program funding, including collection of fees.

V. A VISION FOR THE FUTURE (p. 113)

- We support collaboration with key partners, as long as it doesn't dilute the effectiveness and speed of implementation. California needs to stand up for a high standard of GHG reductions, not sink to the "lowest common denominator."

- We applaud the planned expansion of research by California's universities to develop innovative solutions to all aspects of the plan, but we cannot wait for the "perfect technologies."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-19 19:29:26

No Duplicates.



**Comment 187 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Cathy  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on AB32 Scoping Plan  
Comment:

Please find attached the Western States Petroleum Association's comments on the AB32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/679-wspacommentsonscopingplan.1108.pdf](http://www.arb.ca.gov/lists/scopingpln08/679-wspacommentsonscopingplan.1108.pdf)

Original File Name: WSPAcmentsonScopingPlan.1108.pdf

Date and Time Comment Was Submitted: 2008-11-19 21:45:44

No Duplicates.

**Comment 188 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anthony

Last Name: Eulo

Email Address: anthony.eulo@morganhill.ca.gov

Affiliation: City of Morgan Hill

Subject: Morgan Hill Comments on AB 32 Scoping Plan

Comment:

Please find attached the City of Morgan Hill's comments on the ARB AB32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/680-cityofmorganhillscoping.pdf](http://www.arb.ca.gov/lists/scopingpln08/680-cityofmorganhillscoping.pdf)

Original File Name: CityofMorganHillScoping.pdf

Date and Time Comment Was Submitted: 2008-11-19 22:27:18

No Duplicates.

**Comment 189 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Hugh  
Last Name: Ewing  
Email Address: hfewingjr@comcast.net  
Affiliation: Ebbetts Pass Forest Watch

Subject: AB32 Scoping Plan  
Comment:

Please find attached our comments on the AB32 Scoping Plan

Attachment: [www.arb.ca.gov/lists/scopingpln08/682-arb\\_scoping\\_plan\\_response.doc](http://www.arb.ca.gov/lists/scopingpln08/682-arb_scoping_plan_response.doc)

Original File Name: ARB Scoping Plan Response.doc

Date and Time Comment Was Submitted: 2008-11-20 07:20:27

No Duplicates.

## **Comment 190 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael

Last Name: Sonn

Email Address: sonn.michael@gmail.com

Affiliation:

Subject: Indirect Source Rule (ISR)

Comment:

The goal for the land use sector should be 11-14 MMT. A September 2008 scientific analysis by Dr. Reid Ewing and Dr. Arthur C. Nelson, leading experts on smart growth and climate change, finds that a target of 11-14 MMT is achievable and advisable. An 11-14 MMT target would encourage new communities to be walkable, affordable, and to have great transportation choices while a lower target would encourage business as usual.

The Scoping Plan should include adoption of a statewide Indirect Source Rule (ISR) for carbon dioxide. ISR, already in effect in the San Joaquin Valley for air pollution, is a proven policy tool that helps developers and planners calculate and mitigate the impacts of projects.

The plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion.

Current growth patterns put the state on a path that will result in a 50-70 percent increase in driving over the next 30 years. Such an increase in driving would cancel out the emissions benefits of improved fuel economy and low carbon fuels. It is imperative that the state provide strong leadership and encourage local and regional governments to adopt ambitious targets for greenhouse gas reductions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-20 09:37:51

No Duplicates.

**Comment 191 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Nancy

Last Name: Red

Email Address: nred@ci.chowchilla.ca.us

Affiliation: City of Chowchilla

Subject: AB 32 Scoping Plan Comments

Comment:

Please see attached letter from the City of Chowchilla.

Attachment: [www.arb.ca.gov/lists/scopingpln08/686-ab\\_32\\_scoping\\_plan\\_nov08.doc](http://www.arb.ca.gov/lists/scopingpln08/686-ab_32_scoping_plan_nov08.doc)

Original File Name: AB 32 Scoping Plan nov08.doc

Date and Time Comment Was Submitted: 2008-11-20 10:39:26

No Duplicates.

**Comment 192 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Craig

Last Name: Vejvoda

Email Address: ryoder@ci.tulare.ca.us

Affiliation: Mayor City of Tulare

Subject: Comment Letter re Air Resources Board Proposed Scoping Plan  
Comment:

Please find the attached scanned letter as referenced above.

Attachment: [www.arb.ca.gov/lists/scopingpln08/687-carb\\_letter\\_111808.pdf](http://www.arb.ca.gov/lists/scopingpln08/687-carb_letter_111808.pdf)

Original File Name: CARB Letter 111808.pdf

Date and Time Comment Was Submitted: 2008-11-20 10:40:49

No Duplicates.

**Comment 193 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard

Last Name: Lyon

Email Address: rlyon@cbia.org

Affiliation: CA Building Industry Association

Subject: CBIA preliminary comments on Proposed Scoping Plan

Comment:

Thank you

Attachment: [www.arb.ca.gov/lists/scopingpln08/690-carb\\_sp\\_comments\\_nov08.pdf](http://www.arb.ca.gov/lists/scopingpln08/690-carb_sp_comments_nov08.pdf)

Original File Name: CARB SP COMMENTS NOV08.pdf

Date and Time Comment Was Submitted: 2008-11-20 11:06:22

No Duplicates.

**Comment 194 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lynn

Last Name: Axelrod

Email Address: lynnl@rri.org

Affiliation:

Subject: Report submitted by Resource Renewal Institute

Comment:

Please find attached a report from a Green Plans-Sustainability perspective by an architect of New Zealand's Resource Management Act and a member of its Environment Court, an individual who knows California well.

Attachment: [www.arb.ca.gov/lists/scopingpln08/691-fookesab32report.doc](http://www.arb.ca.gov/lists/scopingpln08/691-fookesab32report.doc)

Original File Name: FookesAB32Report.doc

Date and Time Comment Was Submitted: 2008-11-20 11:17:45

No Duplicates.



## Comment 195 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: grey

Last Name: kolevzon

Email Address: greyloom@hotmail.com

Affiliation:

Subject: climate plan comments

Comment:

### OVERVIEW

It seems to me that the document so far looks excellent and right on target, but I wanted to suggest some ideas for additions to section #8 under strategies ("Implement policy changes at the local, regional, and national level..."). While my suggestions may seem too extreme to be accepted and therefore politically non-viable, I would like the group to consider that probably most of us are well-insulated from a real understanding of what it means to be in a position of desperation - to be unable to afford food, water, and housing, with no safety net of strong community ties to fall back upon. Yet, as the world's living systems begin to decline in productivity with accelerating speed, economic systems will follow hand-in-hand, and when large percentages of our population newly find themselves in exactly this position, the threat to our very society will make increased heating and floods look completely inconsequential. As we have glimpsed with the credit collapse, in an interconnected global economy any stress falls first on those with fewest resources, and it is primarily their basic needs rather than luxuries that are endangered.

This phenomenon is already beginning to take place in many other more vulnerable countries in other parts of the world in ways that affect large percentages of local populations, and has resulted in increasing numbers of refugees from environmental disasters and ensuing social conflicts related to diminishing resources. The United States' tremendous overall wealth has insulated much of our population from truly understanding and coming to terms with this phenomenon for the present moment, but I would venture to project that after another 20-30 years of declining ecological productivity, the global economy may not be so full of surpluses that the United States can depend upon extracting to its own advantage. In other words, the sooner we fully understand the implications of economic collapse the better, as most of our own population will find itself in the same boat but without the local relationship networks and social structures that have always allowed cash-poor communities around the globe to survive. Whether or not we can adapt with our society more or less intact will depend on how forward-thinking our leaders are now, how quickly and objectively we can evaluate the present, and whether or not we take a leap of faith and boldly embrace changes that would seem absurd and impossible to someone trapped in current patterns of thought and action.

Enough background - while we can certainly lower carbon emissions by retrofitting buildings, increasing fuel efficiency of cars, etc., all of these changes will not be significant enough to reach

the goals that scientists have warned us we need to reach, and that are now legally mandated in legislation. I believe that our key strategies should pursue three large-scale goals, and that these be made very explicit:

1. Transition out of using cars as our main form of personal transportation
2. Transition cities from car-based environments into livable, walkable/bikeable neighborhood-based communities
3. Shift our base of economic activity from relying heavily on global trade to become more region-centered
4. The removal of a certain amount of key land resources (food producing lands and low-income urban housing) from the speculative market through the establishment of community land trusts in every region of the state.

My suggestions seek to address root causes by: 1) reversing the patterns of dislocation of people from land that got us into this situation in the first place; 2) avoiding social collapse by strengthening communities, creating an additional urban resource base by reconfiguring land use, and facilitating residents of local areas to work together to overcome the great economic inequalities that presently exist.

#### STRATEGIES

A number of strategies could be adopted to move toward these goals; some are as follows:

- 1) the empowerment of local and regional governments to take strong, effective action through tax-based incentives that bring about dramatic changes in the ongoing development and redevelopment of our land use, transportation, and resource distribution systems.
- 2) The transition of taxation systems from income- and sales-based to carbon based; in other words, a baseline level of acceptable resource use and carbon emissions would be established using existing ecological measures, with a "tax" levied on individuals and businesses using more and a "rebate" going to those using less. A percentage of this tax income could also be invested in the development of systems and technologies that lower carbon use, such as community farmland preservation, bicycle production and distribution, public transit improvements, building retrofitting, clean energy technologies.
- 3) The creation of social networks and legal structures that actively support accelerated resource-sharing and "economic conservation" on a local level, to provide a safety net for basic needs and soften the impacts of a collapsing economy. This could be the expansion of food banks, the conversion of abandoned properties into neighborhood resource centers, the use of abandoned homes for housing Green Jobs crews, etc.
- 4) The creation of land trusts that remove critical resources from speculative markets with the mission of providing affordable housing for low-income community members, preserving agricultural lands, and maintaining an appropriate balance of open spaces and urbanized areas.
- 5) Encouraging the implementation of programs that enable a reintegration of human communities and living systems - urban greening, urban agriculture, watershed education
- 6) Supporting initiatives that develop a foundation for a productive green economy through green jobs training programs, youth employment programs, and expansion of education programs in K-12 schools and colleges related to ecological sustainability and economic opportunities with local, green jobs.

Thanks very much,  
Grey Kolevzon  
greyloom@hotmail.com

Cycles of Change HOPE Collaborative  
[www.cyclesofchange.org](http://www.cyclesofchange.org) [www.oaklandfoodandfitness.org](http://www.oaklandfoodandfitness.org)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-20 12:04:49

No Duplicates.

**Comment 196 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Rachel  
Last Name: Kaldor  
Email Address: rkaldor@dairyinstitute.org  
Affiliation:

Subject: CARB AB 32 Scoping Plan  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/693-carbscopingplanltr.doc](http://www.arb.ca.gov/lists/scopingpln08/693-carbscopingplanltr.doc)

Original File Name: CARBscopingplanltr.doc

Date and Time Comment Was Submitted: 2008-11-20 12:08:48

No Duplicates.

**Comment 197 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Alex

Last Name: Hamilton

Email Address: alexh@ci.commerce.ca.us

Affiliation:

Subject: City comments to proposed Scoping Plan

Comment:

Attached is a letter representing comments and concerns on behalf of the City of Commerce. Please enter into the record and feel free to contact me if you have any questions. Thanks for the opportunity to comment. We feel it is critical that you hear from local agencies/cities as we are on the "front line" implementing rules and regulations from the State.

Alex Hamilton

Assistant Director of Community Development

Attachment: [www.arb.ca.gov/lists/scopingpln08/695-arbcomment.pdf](http://www.arb.ca.gov/lists/scopingpln08/695-arbcomment.pdf)

Original File Name: arbcomment.pdf

Date and Time Comment Was Submitted: 2008-11-20 12:45:44

No Duplicates.

**Comment 198 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Carla

Last Name: Din

Email Address: [din@apolloalliance.org](mailto:din@apolloalliance.org)

Affiliation: California Apollo Alliance

Subject: CA Apollo Comment Letter on Proposed Scoping Plan

Comment:

Please see the attached letter from the California Apollo Alliance.

Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/698-ca\\_apollo\\_alliance\\_letter\\_to\\_carb\\_proposed\\_scoping\\_plan\\_final.doc](http://www.arb.ca.gov/lists/scopingpln08/698-ca_apollo_alliance_letter_to_carb_proposed_scoping_plan_final.doc)

Original File Name: CA\_Apollo\_Alliance\_Letter\_to\_CARB Proposed Scoping Plan FINAL.doc

Date and Time Comment Was Submitted: 2008-11-20 13:45:16

No Duplicates.

**Comment 199 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE's Comments on Proposed Scoping Plan

Comment:

Attached are SCE's Comments on CARB's Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/700-sce\\_comments\\_on\\_carb\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/700-sce_comments_on_carb_proposed_scoping_plan.pdf)

Original File Name: SCE Comments on CARB Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-11-20 14:33:21

No Duplicates.

## **Comment 200 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jennnifer  
Last Name: Miller  
Email Address: jmillier@partnershipph.org  
Affiliation: Partnership for the Public's Health

Subject: Maximize Public Health Benefit of Scoping Plan  
Comment:

November 20, 2008

RE: Comments on Climate Change Proposed Scoping Plan

Dear Chair Nichols and Members of the California Air Resources Board:

We commend the California Air Resources Board (CARB) for its groundbreaking efforts to develop a comprehensive plan to reduce greenhouse gas emissions, and we are very pleased to see that the final version of the Scoping Plan is a significant improvement over the earlier draft.

We applaud the plan's greater emphasis on the role of land use planning and local government efforts in meeting the greenhouse gas reduction goals:

- The new plan more than doubles the goal for emission reductions from the land use sector (from just 2 million metric tons to 5).
- The plan also calls on local governments to reduce their emission by 15% over projected 2020 emission levels.

We also greatly appreciate the inclusion of the California Department of Public Health (CDPH) as the newest member of the Climate Action Team (CAT).

But before the Board adopts the final plan, we urge you to take the following actions to maximize the public health benefits of the Scoping Plan and protect vulnerable and low-income communities.

1. Establish a formal role for public health in the implementation of AB 32 regulatory and market strategies.

While CARB has tremendous expertise and knowledge about the air quality benefits of global warming strategies, there is a strong need for a broader range of information on health impacts and health benefits of mitigation strategies. It is important that the Scoping Plan include a clear commitment from the Board to reach out to the broad range of health constituencies.

We ask that you direct staff to come back within three months with recommendations for establishing a formal process to include state and local public health agencies and organizations in the development and review of all proposed greenhouse gas reduction measures, including proposed regulatory and market mechanisms, so that they can provide input and analysis of the broad range of



health benefits and concerns related to those measures.

2. Ensure protection for already over-impacted communities. Mitigation strategies, such as cap-and-trade programs or siting of new "green" facilities, must not exacerbate already existing health inequities in low-income communities. Such communities are already unequally burdened by extremely poor environmental conditions and poor health. This plan must include adequate safeguards for these communities. The Board must insure that each measure included in the Scoping Plan will not only assist statewide greenhouse gas reduction goals but will also improve conditions in local communities. This means that the measures must both prevent creation of localized pollution "hot spots" and demonstrate the ability to achieve real improvements in air quality and health conditions in all communities in the state.

We ask that you establish additional measures in the Scoping Plan to identify and ensure protection of vulnerable and low-income communities and prevent any backsliding on air quality protections. This includes directing CARB staff to do the following:

- a. Establish within one year a cumulative impacts screening protocol to identify those communities most impacted by air pollution;
- b. Design regulator and market-based compliance mechanisms to achieve maximum emission reductions and co-benefits in these communities; and
- c. Initiate a public process to determine how resources generated through implementation of AB 32 measures can be allocated to minimize adverse health impacts and create climate resiliency in our most vulnerable communities.

3. Set a higher target for greenhouse gas reductions from the land use sector.

The current target of 5 million metric tons (MMT) does not keep us on track for achieving our 2050 greenhouse gas reduction goals. We need to reduce vehicle miles traveled (VMT) by 10% by 2020, but the current 5 MMT target equates to only a 4% reduction in VMT. By assigning only minimal emission reduction targets to land use and transit policies, CARB misses a critical opportunity to spur meaningful change in the built environment to mitigate climate change and improve the public's health. This mitigation strategy would provide substantial health co-benefits to Californians, and as a result, provide health-related savings.

Requiring better land use and transportation planning will reduce greenhouse gas emissions, improve air quality and physical activity levels, and reduce obesity-related illnesses such as diabetes and cardiovascular disease. Obesity has reached epidemic proportions and is a significant factor in rising health costs. In 2000, the estimated national costs attributable to obesity amounted to \$118 billion.

Twenty-five percent of all development on the ground in 2020 will have been built between 2010 and 2020. This presents a tremendous opportunity to improve the design of new development so that it allows people to choose alternatives to driving and provides access to public transit. When people live in compact, mixed-use communities they drive 30% less than those who live in sprawling suburban developments. Strengthening this component of the mitigation strategy will not only improve public health through increased physical activity, but because of health cost savings,

provide an economic co-benefit as well.

CARB should increase the goal for emissions reductions due to smart land use planning to 11 - 14 MMT. This would send an important signal to create communities that enable people to get out of their cars and walk, bike, or take public transit—improving their own health while improving the health of the planet.

Thank you for considering these suggestions.

Sincerely,

Jennifer Miller, PhD  
On behalf of Partnership for the Public's Health

Attachment: [www.arb.ca.gov/lists/scopingpln08/701-comment\\_letter\\_on\\_carb\\_proposed\\_scoping\\_plan\\_081119.doc](http://www.arb.ca.gov/lists/scopingpln08/701-comment_letter_on_carb_proposed_scoping_plan_081119.doc)

Original File Name: Comment Letter on CARB Proposed Scoping Plan 081119.doc

Date and Time Comment Was Submitted: 2008-11-20 14:54:09

No Duplicates.

**Comment 201 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Elaine

Last Name: Archibald

Email Address: cuwaexec@sbcglobal.net

Affiliation: California Urban Water Agencies

Subject: Comments on Proposed AB-32 Scoping Plan and Appendices

Comment:

Please find California Urban Water Agencies comment letter on the Proposed AB-32 Scoping Plan and Appendices attached to this form.

Attachment: [www.arb.ca.gov/lists/scopingpln08/703-scopingplancommentletter112008.pdf](http://www.arb.ca.gov/lists/scopingpln08/703-scopingplancommentletter112008.pdf)

Original File Name: ScopingPlanCommentLetter112008.pdf

Date and Time Comment Was Submitted: 2008-11-20 15:24:25

No Duplicates.

**Comment 202 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anthony

Last Name: Iton

Email Address: lois.fleming@acgov.org

Affiliation:

Subject: AB 32 Comments

Comment:

See Attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/704-letter\\_-\\_ab\\_comments\\_sma.doc](http://www.arb.ca.gov/lists/scopingpln08/704-letter_-_ab_comments_sma.doc)

Original File Name: Letter - AB Comments\_SMA.doc

Date and Time Comment Was Submitted: 2008-11-20 15:41:46

No Duplicates.

**Comment 203 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Deborah

Last Name: Weinstein

Email Address: [dweinstein@treepeople.org](mailto:dweinstein@treepeople.org)

Affiliation:

Subject: TreePeople Comments on Proposed Scoping Plan

Comment:

Please accept the attached letter from TreePeople regarding the Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/706-treepeople\\_letter\\_proposed\\_scoping\\_plan\\_11.19.08.doc](http://www.arb.ca.gov/lists/scopingpln08/706-treepeople_letter_proposed_scoping_plan_11.19.08.doc)

Original File Name: TreePeople letter Proposed Scoping Plan 11.19.08.doc

Date and Time Comment Was Submitted: 2008-11-20 15:55:02

No Duplicates.

**Comment 204 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Milpitas Chamber of  
Last Name: Frank J. De Smidt  
Email Address: government@milpitaschamber.com  
Affiliation: Government Affairs

Subject: AB 32 SCOPING PLAN WILL DESTROY CALIFORNIA SMALL BUSINESSES  
Comment:

CALIFORNIA'S SMALL BUSINESSES CANNOT SURVIVE THIS DEEP RECESSION OR ANY OTHER TIME WITH HIGHER VEHICLE COSTS, HIGHER TAXES AND FEES, HIGHER ELECTRICITY COSTS, HIGHER FUEL COSTS, HIGHR HOUSING COSTS, AND HIGHER COMMERCIAL/INDUSTRIAL BUILDING COSTS RESULTING FROM THE PROPOSED AB32 DRAFT PLAN. THIS PLAN, BASED ON UNPROVEN JUNK SCIENCE, WILL DECIMATE THOUSANDS AND THOUSANDS OF JOBS. ONLY REGULATIONS THAT INCREASE JOBS, IMPROVE THE ECONOMY, THAT ARE COST-EFFECTIVE, AND ARE BASED ON SOUND SCIENTIFIC METHODS SHOULD BE CONSIDERED.

THANK YOU

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-20 16:09:24

No Duplicates.

**Comment 205 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Evans

Email Address: rob@naiopie.org

Affiliation: NAIOP Inland Empire Chapter

Subject: AB 32 Scoping Plan/Appendices/Economic Analysis Comments

Comment:

comments will be uploaded as the following file name:  
AB32NAIOPIECommentsLtrr.pdf

Attachment: [www.arb.ca.gov/lists/scopingpln08/710-ab32naiopiecommentsltrr.pdf](http://www.arb.ca.gov/lists/scopingpln08/710-ab32naiopiecommentsltrr.pdf)

Original File Name: AB32NAIOPIECommentsLtrr.pdf

Date and Time Comment Was Submitted: 2008-11-20 16:39:35

No Duplicates.

## Comment 206 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Charles  
Last Name: Plopper  
Email Address: cgplopper@ucdavis.edu  
Affiliation: UC Davis

Subject: Scoping Plan  
Comment:

California Air Resources Board:  
Subject: AB32 Scoping Plan

When completing the Final Draft of the Scoping Plan for AB32, please consider the following recommendations for inclusion. A number of recent studies have emphasized how critical this plan is for California's future and reinforce the need for this plan to be as rigorous and forceful as possible. The cleaning of the air will be one of the major benefits of this plan. Jane Hall, a Professor at CSU Fullerton and her colleagues, have found that the shortened life spans, childhood illness and lost workdays produced by the polluted air in California's two most polluted regions currently cost the state approximately \$28 billion per year.

Reducing the rate of ocean rise will save our coastal cities. The Public Policy Institute of California has summarized the drastic impact which an elevation of between 8 and 16 inches will have on our cities and other coastal resources.

In a separate study, Fredrich Kahrl and David Roland-Holst of UC Berkeley have placed the cost of coastline resource destruction at \$300 million and \$3.9 billion per year, with a total of \$2.5 trillion of real estate assets at risk from a combination of sea level rise, wildfires and extreme weather events.

As the recent debacle with US automakers, who have fought for over 25 years the very changes in emission and fuel economy regulations which would now render them in the forefront of their industry had they followed them, has shown us, being less than rigorous and aggressive in addressing the issue of global warming will place California at severe risk. Tough measures such as the following must be included in the plan.

- The State should auction 100% of permits under the cap. Polluters should pay for their emissions, not be given free permits that subsidize coal and prolong the transition to cleaner energy.
- The Scoping Plan should specify that all auction revenues will be used to provide a Dividend to compensate consumers. Given the state of the economy, helping consumers deal with fuel and electricity costs is the best use of auction revenues.
- I support CARB's proposal for Carbon Fees on fossil fuel companies to help fund CARB's implementation of AB32. It is critical that Carbon Fees can also provide funding sources for clean technologies, green jobs, energy efficiency programs, and more.

Sincerely,  
Charles G. Plopper, PhD  
Professor Emeritus  
University of California, Davis



Attachment: [www.arb.ca.gov/lists/scopingpln08/711-california\\_air\\_resources\\_board.doc](http://www.arb.ca.gov/lists/scopingpln08/711-california_air_resources_board.doc)

Original File Name: California Air Resources Board.doc

Date and Time Comment Was Submitted: 2008-11-20 16:55:11

No Duplicates.

**Comment 207 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tony

Last Name: Loftin

Email Address: HikingTony@earthlink.net

Affiliation: Chair, Sacramento Group, Sierra Club

Subject: AB 32 Scoping Plan

Comment:

Dear Madam or Sir Board Member:

Please see my comments, attached.

Thank you,

Tony Loftin

Attachment: [www.arb.ca.gov/lists/scopingpln08/714-air\\_resources\\_board\\_comments\\_-\\_ab\\_32\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/714-air_resources_board_comments_-_ab_32_scoping_plan.pdf)

Original File Name: Air Resources Board Comments - AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-11-21 03:48:53

No Duplicates.

**Comment 208 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Colin

Last Name: Mathewson

Email Address: [cmathewson@pricecharities.org](mailto:cmathewson@pricecharities.org)

Affiliation:

Subject: AB 32 Comments from Mid-City Community Advocacy Network, San Diego  
Comment:

attached

Attachment: [www.arb.ca.gov/lists/scopingpln08/719-081119\\_ab32.doc](http://www.arb.ca.gov/lists/scopingpln08/719-081119_ab32.doc)

Original File Name: 081119\_AB32.doc

Date and Time Comment Was Submitted: 2008-11-21 11:17:04

No Duplicates.

## **Comment 209 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Allen

Last Name: Dusault

Email Address: adusault@suscon.org

Affiliation: Sustainable Conservation

Subject: Implementation for Agriculture

Comment:

I appreciate the opportunity to comment on the AB 32 Scoping Plan. This will serve as the Gold Standard nationally for addressing climate change.

The Scoping Plan gets a lot right and you are to be commended for your difficult work. A major concern is the ability to implement it. Here is a "report from the trenches" from an organization that has been working to put in place voluntary measures related to agriculture. We have been specifically focusing on measures that reduce greenhouse gas emissions while improving air and water quality. However we have encountered significant barriers that are proving difficult to surmount.

For example, we have pioneered conservation tillage, a way to prepare land for crop production that reduces dust and diesel emissions while sequestering carbon in soil. When we started there were only a couple hundred acres under conservation tillage while today there are tens of thousands of acres. But our efforts are being hindered as funding for a key partner, UC Cooperative Extension, continue to be cut. That will make it much more difficult to significantly expand acreage further.

We also have been developing carbon negative California biofuels that have no food for fuel trade-off. Unfortunately, State funding as been sparse at best and we have had to operate with much less funding than is needed to fully commercialize beneficial biofuel production systems.

Additionally, we have pioneered renewable biomethane both as a natural gas substitute and for vehicle fuel to displace dirty diesel in trucks. The first biomethane powered heavy duty diesel truck is coming on line later this year. However, a second project is stalled for lack of funding. We hope AB 118 funding can be brought to bear but that is only a first step. We are hoping the State can play a greater role in encouraging these clean air, greenhouse gas reducing transportation options.

We have also helped to create a new renewable energy industry, specifically biogas digesters using agricultural waste like dairy manure. Biogas digesters, an early action measure identified in the scoping plan, can improve water and air quality in addition to reducing up to 1 million metric tons of CO2 equivalent GHG. Unfortunately new requirements from the San Joaquin Valley Air District will likely stop development of new digesters and may shut down some existing facilities. We are working on solutions to overcome these obstacles but we have found that State officials are

poorly informed about what is happening on the ground and that is making matters worse.

Likewise for composting facilities. We have helped to develop new models of co-composting that can reduce greenhouse gas emissions while improving air quality. But new rules threaten to close existing facilities and prevent new ones from opening even though they have significant air, water and GHG benefits.

Institutional barriers, particularly the "silo" approach to regulation, threaten to undermine these efforts. There can be 100 units of environmental benefit and 5 units of liability and that will be considered "backsliding". The net result is what I term, "regulatory sudden death". That occurs when a pollutant goes over a regulatory threshold by any amount, irrespective of the overall project benefit. The concept of "net environmental benefit" must be factored into State agency approaches to AB 32 implementation. There are ways to do this within existing regulatory structures. But there must be a recognition of the problem and a willingness to fix it. That has not happened yet with key agency decision-makers. It needs to happen.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-21 13:28:25

No Duplicates.

## Comment 210 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Erin

Last Name: Rogers

Email Address: erogers@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Clean Tech Business Letter in Support of Limiting Offsets

Comment:

Clean Tech Statement of Support:

Limiting Offsets & Prioritizing Clean Energy in a Western Regional Cap and Trade System

WHEREAS:

Western States' Electricity GHG Reductions Could Come from Offsets Instead of Renewables: The Western Climate Initiative (WCI) is recommending a regional, multi-sector global warming cap and trade program that would allow the electricity sector and other capped emitters to use offsets to substitute for up to half of the direct emission reductions they otherwise would have been required to make. The WCI will not approve offset credits for global warming emission reductions that come from renewable energy projects in the US or other developed countries.

Offsets Could Drain Funding from Renewable Energy: A significant use of compliance offsets in a cap and trade system will likely drain potential new flows of capital away from renewable energy and other clean tech global warming solutions in high-emitting, capped sectors such as electricity. Limiting offsets, on the other hand, can help direct new capital toward clean tech solutions and other emission reduction efforts in these sectors by encouraging utilities to purchase renewable energy instead of dirtier energy sources that will become more expensive due to higher carbon prices.

Limiting Offsets Make Renewables More Competitive: Limiting offsets will maintain demand for carbon emission allowances, thus helping to maintain a meaningful allowance price, which should in turn increase the profitability of currently available low-carbon technologies and encourage the development of new clean tech options.

Limiting Offsets Incentivizes Utility Purchases of Renewable Energy: By maintaining a robust carbon price and concentrating emissions reductions in capped sectors, limits on offsets will provide another reason for utilities and publicly-owned utilities to purchase renewable energy above and beyond their existing renewables purchase obligations.

Cap and Trade Should Support Renewable Energy: An effective regional cap and trade system should directly account for and reward the global warming emission reductions resulting from voluntary renewable energy generation by retiring carbon allowances on behalf of voluntary renewable power produced in the region, and encourage development and deployment of renewable energy through

the appropriate use of the value of allowances.

STATEMENT OF SUPPORT:

The signatories below encourage the states and provinces in the Western Climate Initiative to ensure that a regional cap and trade program bolster the development and deployment of renewable energy sources in the region and limit the amount of compliance offsets allowed in any global warming cap and trade system to a small fraction of the emission reductions that the program seeks to achieve.

SUPPORTERS

Businesses & Organizations

Ausra, Inc.  
Holly Gordon

BrightSource Energy  
Joshua Bar-lev

California Wind Energy Association  
Nancy Rader

CEERT  
Rachel McMahon

Cleantech America, Inc.  
Ben Barnes

Climate Earth, Inc.  
Chris Erickson

Environment & Enterprise Strategies  
Holly Kaufman

enXco Development Corporation  
Mark Tholke

Fat Free Biofuel  
Shannon Devine

GreenVolts, Inc.  
Craig Lewis

Large-Scale Solar Association  
Shannon Eddy

Leading Change Consulting  
Steve Levin

New Voice of Business  
Elliot Hoffman

Recurrent Energy  
Arno Harris

Solaria  
David Hochschild

SolFocus  
Kelly Desy

Stirling Energy Systems  
Bob Liden

Sungevity  
JP Ross

Suntech  
Polly Shaw

Sustainable Energy Partners LLC  
John Humphrey

S3: Sustainable Solutions Systems  
Shripal Shah

Vote Solar  
Adam Browning

Individuals  
Dan Kammen UC Renewable and Appropriate Energy  
Laboratory, Technical Board Member, UCS

Oliver Bock  
Clean Tech Investor

William Coleman  
Mohr Davidow Ventures

Attachment: [www.arb.ca.gov/lists/scopingpln08/726-clean\\_tech\\_offsets\\_letter\\_11-21.pdf](http://www.arb.ca.gov/lists/scopingpln08/726-clean_tech_offsets_letter_11-21.pdf)

Original File Name: Clean Tech Offsets Letter 11-21.pdf

Date and Time Comment Was Submitted: 2008-11-21 15:43:20

No Duplicates.



## **Comment 211 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom  
Last Name: Frantz  
Email Address: ini@lightspeed.net  
Affiliation:

Subject: general comments on agriculture and the LCFS  
Comment:

Tom Frantz  
AB 32 EJAC Member  
President, Association of Irrigated Residents  
Kern County Resident, San Joaquin Valley

Comments to Air Resources Board attached

Attachment: [www.arb.ca.gov/lists/scopingpln08/735-general\\_comments\\_to\\_carb\\_on\\_agriculture\\_and\\_lcfs\\_for\\_ab\\_32\\_scoping\\_plan\\_by\\_tom\\_frantz.doc](http://www.arb.ca.gov/lists/scopingpln08/735-general_comments_to_carb_on_agriculture_and_lcfs_for_ab_32_scoping_plan_by_tom_frantz.doc)

Original File Name: general comments to CARB on agriculture and LCFS for AB 32 Scoping Plan by Tom Frantz.doc

Date and Time Comment Was Submitted: 2008-11-23 17:25:14

No Duplicates.

## **Comment 212 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Karen

Last Name: Stone

Email Address: kstone@alac.org

Affiliation: American Lung Association of California

Subject: AB 32 Scoping Plan

Comment:

I urge the CARB Board to adopt a strong global warming scoping plan for California to both slow global warming and achieve immediate reductions in smog and other dangerous air pollutants that cause illness and death. A strong plan will set the standard for national and international action. I also urge the state air board to include a stronger focus on measures to reduce emissions from driving which contribute both the largest percentage of greenhouse gases and dangerous air pollutants in California. Therefore, the plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments. To reach the state's targets for greenhouse gas reduction targets, the plan should additionally include a strong goal and additional regulatory measures for reducing pollution from industrial sources such as petroleum refineries and cement manufacturing facilities. It is also critical that any measures taken to reduce greenhouse gases contain do not increase hot spots of pollution in communities already impacted by multiple sources of pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-23 23:20:05

59 Duplicates.

**Comment 213 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: City of San Jose

Last Name: Environmental Servic

Email Address: julie.benabente@sanjoseca.gov

Affiliation:

Subject: Recycling and Waste Section Comments

Comment:

Please see the attached comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/740-city\\_of\\_sj\\_final\\_1108.pdf](http://www.arb.ca.gov/lists/scopingpln08/740-city_of_sj_final_1108.pdf)

Original File Name: City of SJ Final 1108.pdf

Date and Time Comment Was Submitted: 2008-11-24 10:16:59

No Duplicates.

**Comment 214 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Francis

Last Name: Delach

Email Address: fdelach@ci.azusa.ca.us

Affiliation:

Subject: City of Azusa's comments on Air Resources Board Scoping Plan

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/747-ab32letter1108.pdf](http://www.arb.ca.gov/lists/scopingpln08/747-ab32letter1108.pdf)

Original File Name: ab32letter1108.pdf

Date and Time Comment Was Submitted: 2008-11-24 13:28:54

No Duplicates.

## **Comment 215 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Steven

Last Name: Gallegos

Email Address: sgallegos@alac.org

Affiliation: American Lung Association of California

Subject: Reduce Greenhouse Gas Emissions in CA

Comment:

Ozone, particulate matter and other pollutants contribute to climate change and that ozone is a potent greenhouse gas.

I ask you to support efforts to reduce all emissions that contribute to climate change, including establishing binding limits on emissions, expanding energy conservation and increasing use of renewable sources.

Pollution control strategies, including market-based approaches, must directly reduce local adverse air quality impacts in addition to addressing any global impacts.

I ask you to approve AB 32, the Scoping Plan to Reduce Greenhouse Gas Emissions in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 15:12:39

No Duplicates.

## **Comment 216 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lorna  
Last Name: Rodrigues  
Email Address: ilic@aol.com  
Affiliation:

Subject: slow global warming  
Comment:

Whatever California does gets noticed and copied by other states. I hope that the CARB Board will adopt a strong plan to slow global warming and immediately reduce smog and other dangerous air pollutants.

A key factor in achieving this is definitely looking at goals to reduce vehicle usage and more aggressive measures to reduce pollution due to industry.

Thank you for your attention.  
Lorna Rodrigues  
Oakhurst, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-24 15:37:52

No Duplicates.

**Comment 217 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Art

Last Name: Leahy

Email Address: kessner@octa.net

Affiliation: Orange County Transportation Authority

Subject: OCTA Comments on the Proposed Scoping Plan

Comment:

Attached please find the Orange County Transportation Authority's comments on the Proposed Scoping Plan and associated attachment.

Attachment: [www.arb.ca.gov/lists/scopingpln08/766-proposed\\_scoping\\_plan\\_comment\\_letter\\_-\\_attached.pdf](http://www.arb.ca.gov/lists/scopingpln08/766-proposed_scoping_plan_comment_letter_-_attached.pdf)

Original File Name: Proposed Scoping Plan Comment Letter - Attached.pdf

Date and Time Comment Was Submitted: 2008-11-24 16:40:28

No Duplicates.

**Comment 218 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Elizabeth  
Last Name: Hadley  
Email Address: ehadley@reupower.com  
Affiliation: Redding Electric Utility

Subject: City of Redding Comments to Proposed Scoping Plan  
Comment:

Attached please find comments from the City of Redding on the California Air Resources Board's Proposed Scoping Plan.

Please contact Elizabeth Hadley at 530-339-7327 with any questions.

Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/769-city\\_of\\_redding\\_letter\\_to\\_carb\\_11-12-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/769-city_of_redding_letter_to_carb_11-12-08.pdf)

Original File Name: City of Redding Letter to CARB 11-12-08.pdf

Date and Time Comment Was Submitted: 2008-11-25 08:36:58

No Duplicates.



**Comment 219 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Andrea

Last Name: Tuttle

Email Address: atuttle@suddenlink.net

Affiliation: Forest and climate policy consulting

Subject: International Forest Offsets

Comment:

Please see attached letter expressing support for cautious opening of California's potential GHG market to high-quality emission reduction offsets from developing nations that have committed to a meaningful greenhouse gas program. (Scoping Plan V-A-2; p. 114 ff).

Attachment: [www.arb.ca.gov/lists/scopingpln08/770-scoping\\_plan\\_support\\_ltr\\_\\_intl\\_offsets\\_11-09.docx](http://www.arb.ca.gov/lists/scopingpln08/770-scoping_plan_support_ltr__intl_offsets_11-09.docx)

Original File Name: Scoping Plan support ltr Intl Offsets 11-09.docx

Date and Time Comment Was Submitted: 2008-11-25 08:52:32

No Duplicates.

**Comment 220 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Steven  
Last Name: Rogers  
Email Address: srogers@yville.com  
Affiliation: Town of Yountville

Subject: Comments  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/771-arb\\_comments\\_ltr\\_112608.dot](http://www.arb.ca.gov/lists/scopingpln08/771-arb_comments_ltr_112608.dot)

Original File Name: ARB comments ltr 112608.dot

Date and Time Comment Was Submitted: 2008-11-25 08:54:53

No Duplicates.

**Comment 221 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Norman  
Last Name: Plotkin  
Email Address: norm@pzallc.com  
Affiliation: CAWA/AAIA

Subject: Revised Scoping Plan Comments  
Comment:

Please find attached comments from the California Automotive Wholesalers' Association and the Automotive Aftermarket Industry Association on the revised draft scoping plan. If there are any questions regarding these comments, please feel free to contact me at 916-446-5900.

Regards,

Norman Plotkin

Attachment: [www.arb.ca.gov/lists/scopingpln08/772-cawa-aaia\\_revised\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/772-cawa-aaia_revised_scoping_plan_comments.pdf)

Original File Name: CAWA-AAIA Revised Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-11-25 09:01:15

No Duplicates.

**Comment 222 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Norman  
Last Name: Plotkin  
Email Address: norm@pzallc.com  
Affiliation: ARPI

Subject: Revised Scoping Plan Comments  
Comment:

Please find attached comments from the Automotive Refrigeration Products Institute on the revised draft scoping plan. If there are any questions regarding these comments, please do not hesitate to contact me at 916.446.5900.

Regards,

Norman Plotkin

Attachment: [www.arb.ca.gov/lists/scopingpln08/773-arpi\\_revised\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/773-arpi_revised_scoping_plan_comments.pdf)

Original File Name: ARPI Revised Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-11-25 09:09:19

No Duplicates.

## **Comment 223 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John  
Last Name: Busterud  
Email Address: jwbb@pge.com  
Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on the ARB's October 2008 AB 32 Proposed Scoping Plan  
Comment:

November 25, 2008 VIA ELECTRONIC FILING

Ms. Mary Nichols, Chairman  
CALIFORNIA AIR RESOURCES BOARD  
1001 I Street  
Sacramento, CA 95812-2828

Mr. James Goldstene, Executive Officer  
CALIFORNIA AIR RESOURCES BOARD  
1001 I Street  
Sacramento, CA 95812-2828

Mr. Chuck Shulock, Chief  
Office of Climate Change  
CALIFORNIA AIR RESOURCES BOARD  
1001 I Street  
Sacramento, CA 95812-2828

Re: Pacific Gas and Electric Company's Comments on the California  
Air Resources Board's October 2008 AB 32 Proposed Scoping Plan

Dear Chairman Nichols and Messrs. Goldstene and Shulock:  
Pacific Gas and Electric Company ("PG&E") welcomes the opportunity to provide these comments on the California Air Resources Board's ("ARB") October 2008 Proposed AB 32 Scoping Plan ("Plan"). We also incorporate here by reference our comments on the June 2008 Draft Scoping Plan filed with the ARB on August 5, 2008 and the comments we have filed on recommendations by the California Public Utilities Commission ("CPUC") and the California Energy Commission ("CEC") on AB 32 policies affecting electricity and natural gas services provided to California consumers, businesses, and public institutions (copies enclosed).

### I. INTRODUCTION.

PG&E is committed to working with the ARB, other State agencies and concerned stakeholders to make AB 32 a success and a model for emerging regional and national greenhouse gas ("GHG") reduction programs. We commend ARB Staff for their efforts in producing the Plan which provides a comprehensive, conceptual roadmap for the regulatory implementation process to follow between now and 2012. As the Plan recognizes, there remains much work to be done in the months and years ahead to ensure that the reduction measures ultimately adopted by ARB achieve the State's GHG reduction targets

in a "technologically feasible," "cost-effective" and "equitable" manner as required by AB 32. /

PG&E and our customers share California's desire to continue leadership on climate change, and this is why we were the first investor-owned utility to support enactment of AB 32. PG&E is a gas and electric utility serving one in twenty Americans and is committed to leadership on climate change. Our customers have invested and continue to invest in customer energy efficiency ("CEE") programs and a clean electric generating portfolio, so that our emissions are among the lowest of any utility in the nation. Indeed, over 50% of the electricity PG&E currently delivers to its customers comes from sources that emit no greenhouse gases at all.

PG&E approaches AB 32 implementation guided by four key objectives:

1. Ensure environmental integrity through adoption and use of mandatory, real and verifiable reductions;
2. Manage costs to California consumers and businesses by pursuing technologically feasible and cost-effective reduction strategies using well-designed market-based mechanisms and a consumer-oriented allowance allocation approach;
3. Solidify California's national leadership role on climate change by creating a model program that can be integrated effectively with future regional, national and international programs;
4. Equitably apportion reduction obligations to ensure that all sectors pay their fair share. State-wide reduction obligations should be apportioned to ensure that no single source, sector, nor its customers, assumes a disproportionate cost burden.

With these objectives in mind, the following summary highlights our over-arching comments on the Plan. Our more detailed comments are set forth in section III following this summary.

## II. SUMMARY.

### A. The Proposed Plan Properly Takes a Comprehensive Approach To Achieving GHG Reductions.

AB 32 calls for ARB to consider three critical questions as it implements measures to meet the AB 32 goals:

1. Are identified emissions reductions technologically feasible?
2. Are the emissions reduction measures cost-effective? For example, is each measure cost-effective compared to alternative measures or programs that could be undertaken to achieve the same quantity of reduction?
3. Are the emissions reduction measures fair and equitable when compared to the relative contribution of each source and sector to overall GHG emissions in California?

The ARB will need to evaluate and pursue reduction measures across all sectors of the economy to achieve AB 32's GHG reduction targets. The Plan takes an important first step toward this

comprehensive approach by identifying a wide range of measures, including market mechanisms and programs, and by recognizing that all reduction measures must be carefully analyzed and compared for technological feasibility and cost effectiveness during the AB 32 regulatory implementation process (Plan, pp. ES-6 and 7, 84, 85 and 106).

The Plan also recognizes that current cost estimates reflect a range of potential costs associated with programmatic measures and that the criteria for assessing cost-effectiveness may evolve during regulatory implementation. We support the ARB's commitment to conduct additional and updated cost-effectiveness analyses of the proposed measures during the rulemaking phase in a rigorous and transparent process with full public participation and opportunity for review and comment (Plan, pp. 84, 85). We are concerned, however that the analysis performed to date has not provided a systematic comparison of all proposed measures across all sectors. To this end, we urge the ARB to take a comprehensive State-wide approach to assessing cost-effectiveness to ensure that all measures are analyzed and compared across all sectors of our economy during the rulemaking process.

#### B. PG&E Supports the Proposed Plan's Endorsement of Cap-and-Trade Market Mechanisms to Achieve Verifiable, Timely and Cost-Effective GHG Reductions.

PG&E commends the ARB for recognizing that a well-designed, multi-sector regional or national cap-and-trade program linked to the Western Climate Initiative ("WCI") and other emerging regional and national programs can provide real, sustained and cost-effective GHG reductions (Plan, p. 30). We strongly support the Proposed Plan's recommendation to convene a rulemaking to design and implement the cap-and-trade program and to seek input from the public and stakeholders and those with expertise relevant to the design of cap-and-trade programs (Id., p. C 23). We look forward to participating in this process.

To manage market volatility and minimize cost impacts to our customers, especially in these times of economic uncertainty, we believe it is essential that cap-and-trade market design include viable consumer cost protections, such as a price collar or a strategic allowance reserve, which could provide additional allowance supply in the event allowance prices exceed a pre-determined level. For example, a price collar would include market intervention to make additional GHG emission allowances available to mitigate substantial upward movement of allowance prices while maintaining a multi-year carbon budget. A lower bound on allowance prices could also specify minimum acceptable bids in allowance auctions or by other means. We therefore request that ARB amend the Proposed Plan expressly to provide for consideration of potential consumer cost protection mechanisms during the cap-and-trade rulemaking.

It is also important that California's cap-and-trade program be designed from the outset to integrate seamlessly with other market based programs to ensure adequate market depth and liquidity. In this regard, we support the ARB's recommendation that the cap-and-trade rulemaking be closely coordinated with the WCI's timeline for developing a regional cap-and-trade program (Plan, p. 30). In this regard, it is very important that the rulemaking provide a clear process for integrating the design and implementation of the cap-and-trade program with the formal

rulemaking process for the WCI cap-and-trade program and other regional and national programs. ARB should consider combining its cap-and-trade rulemaking with identical rulemaking proceedings among the other states participating in the WCI, so that the design, systems development and testing of a cap-and-trade program can proceed on an efficient, expedited basis with broad public participation by all the WCI states.

Broad access to environmentally sound and verifiable offsets will be necessary to achieve AB 32's reduction targets in a cost-effective manner and we believe there should be no geographic or quantitative limits on their use. While the Plan endorses broad geographic access to offset projects, we believe that the proposed quantitative limit of 49% of annual emission reductions would be unduly restrictive. We also strongly encourage ARB to adopt or approve offset protocols early in the regulatory implementation process to ensure an adequate supply of eligible projects by 2012. These critical components of the overall market design will no doubt benefit from closer analysis during the cap-and-trade rulemaking next year.

#### C. Properly Designed and Equitably Administered Programmatic Measures Can Make a Meaningful Contribution to GHG Reductions.

We agree that programmatic measures have the potential to provide significant GHG reductions in the years ahead if determined to be technologically feasible and cost-effective across all sectors. In this regard, PG&E is committed to increased investment in energy efficiency programs and increased use of renewable resources.

However, as discussed more fully in Section III and in addition to the matters raised in our August 5, 2008 comments and comments at the CPUC and CEC, we have the following concerns regarding certain energy-related programmatic measures: (1) since the Plan acknowledges that ARB is not the agency with expertise in these programs, we urge ARB to look to current and evolving initiatives in the renewables, energy efficiency, and combined heat and power ("CHP") areas at the agencies with expertise in these areas, and to monitor and acknowledge the efforts of these agencies to ensure any GHG "reduction measures" are feasible and cost-effective, both within the energy sector and across all sectors; (2) as a matter of equity, all load serving entities should be subject to the same targets and same cost-effectiveness criteria - the Plan provides for load serving entity ("LSE") equity on energy efficiency, but does not do so explicitly for renewables and CHP.

### III. DISCUSSION.

#### A. PG&E Supports the Proposed Plan's Endorsement of Cap-and-Trade Market Mechanisms to Achieve Verifiable, Timely and Cost-Effective GHG Reductions.

PG&E strongly supports the ARB's recommendation to establish a cap-and-trade program that will link with the other Western Climate Initiative ("WCI") jurisdictions, and we look forward to participating in the cap-and-trade rulemaking. PG&E also agrees with ARB's stated intention to seek input from stakeholders and consult with experts on market design, including allowance allocation and use of auction revenue. In addition, we consider the following topics to be of critical importance for consideration in the rulemaking and by the experts, in addition to those topics listed in Appendix C to the Plan at pages C22-C23:



- Allowance allocation and use of auction revenue, including detailed modeling on consumer economic impacts.
- Consumer cost protection mechanisms.
- Offset policy.
- Integration with the WCI and other developing regional and national programs on cap-and-trade design.
- Appropriate treatment of small commercial and residential natural gas use.

In addition to a process for addressing the` policy issues above, it would be helpful for the public and all stakeholders if ARB created a clearer timeline and integrated regional rulemaking process, working back from 2012, with milestones for adopting specific components of the cap-and-trade program, including development, scaling up and testing of regional market systems. Experience with the implementation of other markets, including Regional Greenhouse Gas Initiative ("RGGI") and California's own Independent System Operator in the electric sector, highlights the need to build in time to allow for adequate systems development and stress testing, as well as schedule slippage. PG&E also recommends that the ARB invite experts from RGGI and the European Union ("EU") to inform California about their experiences.

#### 1. Consumer Cost Protection Mechanisms.

One of the ARB's core policy design principles is to "minimize the economic burden of the program on consumers." (Plan, p. C 20.) Among the most important lessons California learned from the 2000 2001 energy crisis is that timely "backstop" mechanisms are essential to protect customers in the event that unregulated or partially regulated markets experience a catastrophic failure. The need for quick or automatic "backstop" mechanisms applies to other markets as well, including a cap-and-trade greenhouse gas emissions market. /

A well-designed greenhouse gas emissions trading market can attract investment in new GHG reducing technologies and enable markets to determine the most economic and cost-effective means of reducing GHGs across multiple sectors of the economy. However, like any market, and especially commodities and futures markets, even the best designed greenhouse gas emissions trading market can experience failure or significant disruption through hoarding, manipulation, severe weather or other unforeseen circumstances, particularly during its start-up or transitional stages. During the October 23, 2008 ARB Board meeting, Board members asked staff to examine carefully near-term economic impacts of the Scoping Plan, especially in light of current economic turmoil and uncertainty. Consumer cost protection measures will be critical to managing economic impacts of AB 32 implementation, especially during the beginning stages of the cap-and-trade market or if the market is limited regionally. / Price spikes and crashes could impose unnecessary costs on Californians and threaten the long term viability of the GHG reduction program. The scope of ARB's cap-and-trade rulemaking should expressly include an examination of potential consumer cost containment mechanisms, especially those that also maintain long-term environmental integrity.

PG&E believes that consumer cost protection mechanisms can be implemented without impeding investment in low- and zero-carbon technologies or impairing our ability to meet emission reduction goals. As we described in our August 5, 2008 Comments on the Draft Scoping Plan, one possible policy tool to help manage overall

volatility and unexpected economic costs, while at the same time provide a clear path for technology investment and ensure that there is a "price for carbon" is the allowance "price collar." The elements of a "price collar" would include market intervention to make additional GHG emission allowances available to mitigate substantial upward movement of allowance prices while maintaining a multi-year carbon budget. A lower bound on allowance prices could also specify minimum acceptable bids in allowance auctions or by other means. / The Lieberman-Warner and Dingell-Boucher draft national GHG legislation provides another example of a cost protection mechanism that preserves environmental integrity and would enable linkage to other GHG markets: an allowance reserve. Other proposals worthy of examination include those of the U.S. Climate Action Partnership and the Nicholas Institute for Environmental Policy Solutions. / For these reasons, we believe examination and adoption of such mechanisms should be explicitly included in the scope of the cap-and-trade rulemaking.

## 2. Offsets.

PG&E agrees with the Plan's recommendation to endorse the use of offsets without geographic restrictions. However, PG&E is concerned by the numerical limitation on offset quantity, "limited to no more than 49 percent of the required reduction of emissions." In particular, this policy drastically limits the amount of offsets allowed in the first years of the program, which may unintentionally greatly increase adverse economic impacts of the cap-and-trade market. For example, if the 2013 cap is set at 1% below the 2012 emissions level, then this policy implies that the offset quantity would be severely limited to 0.49% of the cap level in 2013. New GHG reducing technology will take time to develop and is generally not likely to be available in the early years of the cap. The Scoping Plan offset policy raises serious concerns about California's ability to meet the cap in the most cost-effective manner in the early years of the program.

Additionally, the policy described does not enable a specific entity to know the quantity of offsets that it will be able to use for compliance. The policy bases the quantity limit on the reductions of the entire cap and provides no guidance for individual entities. Forty-nine percent of the required reductions may be as little as less than 1% of an entity's compliance obligation in early years and possibly 10% of an entity's compliance obligation in later years. During the rulemaking process, the ARB needs to clarify application of offset policy so that individual entities have adequate understanding and notice of the offsets they may use.

Finally, the Scoping Plan should contain a process to have the Board or Executive Officer start approving protocols in a timely fashion to ensure an adequate supply of offset projects by 2012. The Scoping Plan states that offsets must be "quantified according to Board-adopted methodologies, and ARB must adopt a regulation to verify and enforce the reductions" (Plan, p. 36). The development of offset projects will take years, and project proponents will need surety in the protocols they are allowed to use. The Board should adopt a schedule to review and adopt existing protocols in order to not stifle the offset market and prevent access to these cost-effective GHG reduction options.

## 3. Natural Gas Sector.

PG&E agrees with the ARB decision not to include small commercial and residential natural gas use in the first term of the cap-and-trade program. As we have stated in past comments, this sector of natural gas users may be better served by taking into account reductions already forecast under energy efficiency programs. Evaluation of whether and how small natural gas end users should be regulated should be included in the scope of the cap-and-trade proceeding and in the continuing consideration of the cost-effectiveness and feasibility of energy efficiency measures as part of AB 32.

## B. Programmatic Measures.

### 1. Renewable Energy Resources.

PG&E supports the increased use of renewable energy and agrees that the expanded development and procurement of renewable resources can play a significant role in meeting AB 32's GHG reduction goals. Indeed, in Executive Order S-14-08, issued November 17, 2008, Governor Schwarzenegger has called for all sellers of electricity to "serve 33 percent of their load with renewable energy by 2020." The Executive Order properly notes that achieving this goal will require "greater coordination and streamlining of the siting, permitting, and procurement processes for renewable generation," including addressing "various challenges that impeded...timely realization [of renewables goals], relating to transmission, financing, siting, permitting, integration, environmental and military objectives, technology development and commercialization and equipment." Governor Schwarzenegger also found that "there are substantial barriers to generation siting, permitting and transmission that must be addressed in order to achieve the 2010 and 2020 RPS goals." / The ARB, in the Proposed Plan, also describes some of the challenges to achieving a 33 percent renewable energy procurement goal, especially those related to transmission and system integration. Nevertheless, the Scoping Plan counts on the emissions avoided from this target and assumes these challenges will be addressed in time to achieve the 33 percent goal. For example, the Scoping Plan does not currently acknowledge the multi-year, multi-agency permitting challenges that are slowing renewables development. A February 2008 State Auditor's Report indicated that it can take 36 months for a generator to receive all the necessary permits to begin site construction. / The Plan should now reflect the same findings on these challenges as noted in the Governor's Executive Order, and acknowledge the uncertainty of relying on emissions reductions from a 33 percent renewables mandate until the barriers to implementation and cost-effectiveness issues are addressed and removed. It is essential that the Proposed Plan provide compliance off-ramps and flexibility for issues such as transmission availability, system integration, siting and other permits, as well as availability of financing, all of which may be beyond the control of PG&E and other load-serving entities.

In the Draft Scoping Plan, PG&E noted that the 33% renewables goal referenced actions by both investor-owned and publicly-owned utilities. This language was removed in the Proposed Scoping Plan 33% renewables goal. It is critical that state GHG measures be applied equally, with consistent mandates and accountability rules, to all entities in the state. / This is the approach that was taken by the Legislature, CPUC, and CEC in implementing the emissions performance standard under SB 1368, and it should be the same approach taken by ARB on any programmatic measures that are

included under AB 32. It is also now directly acknowledged by the Governor's call for "all retail providers of electricity" to be covered under his Executive Order.

To further encourage the development of new renewable generation and to foster achievement of the State's renewables goals, PG&E has proposed an innovative pilot program in its 2008 RPS Solicitation that would streamline the contracting process for renewable generators greater than 1.5 MW by offering a form PPA available year-round, with no requirement for renewable generators to participate in the competitive solicitation, thus eliminating the bidding and negotiation process for any renewable generator that accepts the form PPA's terms and conditions. The pilot program would reduce negotiation time, time and effort required for CPUC approval, and still ensure adequate, reliable energy supplies through the use of suitable terms and conditions in a simplified contracting process.

Larger generators should continue to participate in PG&E's competitive solicitations and provide credit assurances and performance guarantees to assure that these resources begin to deliver renewable energy to the grid at the time and in the amount required by their contract. Recognizing that certain generators may desire a more streamlined process, however, PG&E has proposed an innovative pilot program in its 2009 RPS Solicitation that could reduce the time and cost for renewable generators - of any size - to secure a contract, while still protecting PG&E and its customers from potential non-performance under such a contract. However, PG&E's pilot program is not mentioned as an alternative that could increase the number of renewable projects under contract.

## 2. Combined Heat and Power.

The ARB recommends the addition of 4,000 MW of efficient CHP to reduce GHG emissions. Under the ARB assumptions, 3200 MW of this CHP would be under 5 MW and all of it would operate at 85% capacity factor. PG&E appreciates the explicit addition of the criteria of efficiency to the Scoping Plan, for some CHP may actually increase GHG emissions. / We understand that the ARB intends only for efficient CHP sized to minimum, consistent thermal load to be included as a GHG measure. PG&E recommends the ARB communicate its assumption on efficient CHP to the agencies developing the CHP measure such that only CHP that truly represents GHG reductions is supported.

Recommendations on CHP policy extraneous to reducing GHG emissions are beyond the mandate of AB 32 and should not be included in ARB recommendations. The CPUC is already planning to address CHP policy in a new CHP proceeding and in the AB 1613 proceeding, and the CEC should open a similar proceeding to apply equal policies and AB 1613 to publicly-owned utilities ("POUs"). Therefore, the Proposed Scoping Plan Appendix C's inclusion of CEC Integrated Energy Policy Report ("IEPR") CHP recommendations is either inappropriate for AB 32 Scope or is already being addressed by the CPUC for investor-owned utilities ("IOUs"). PG&E recommends that Appendix C be updated to acknowledge that some IEPR recommendations are contrary to legislation or to well-established CPUC findings / and other IEPR recommendations are already being considered or implemented by the CPUC. As such, the status of CHP policy should be changed in Table 32 to correctly characterize the status of policy development.

For example, the CPUC has established a proceeding to implement AB 1613 that will establish a feed-in tariff for efficient CHP up to 20 MW. However, the Plan states that AB 1613 "stops short of providing small CHP operators with the guaranteed access to wholesale markets recommended in the CEC's" IEPR. AB 1613 provides this guaranteed access to wholesale markets for CHP up to 20 MW if the customer wishing access is a bundled IOU customer, PG&E interprets the Plan to be referring to AB 1613's lack of a statewide guarantee for small CHP wholesale market access in non IOU service territories. PG&E agrees that to be truly a comprehensive effort, AB 1613 should be extended state-wide to POU service territories and to community choice aggregators, if they are established.

Rather than relying on IEPR, the Scoping Plan should point out that assumptions about likely market penetration, likely efficiencies, likely operating characteristics, and suggested methods for overcoming market barriers are all preliminary. PG&E's conversations with customers who could install CHP indicate that primary concerns are gas price volatility, maintenance requirements, reliability of cogeneration technology, and the lack of requisite expertise for CHP operations. As the CPUC has recognized, further study and analysis remains before the likely contribution from CHP to GHG emission reductions can be ascertained. PG&E looks forward to working with all concerned stakeholders to study the market, technologies, potential, emissions reductions, costs and benefits of CHP in the energy agency proceedings.

### 3. Customer Energy Efficiency.

PG&E commends ARB for proactively and aggressively committing to remove barriers to more effective deployment of energy efficiency ("EE") resources in the state. Given the very ambitious targets specified in the Plan, success in these programs can only be accomplished by transforming markets in EE products. PG&E supports changes that have been made to the Plan. In particular, the Plan recognizes the importance of comparable energy efficiency targets in all regions of California, for all retail providers.

The Plan also provides additional needed clarity on the origin of the energy efficiency goals, acknowledging that the goals are contingent on innovation, unprecedented market transformation, and unprecedented success of programs. However, the Plan still contains an error that could have important implications for the goal's feasibility. The Plan states that in the CPUC and CEC Aggressive Case in the E3 model, "it is assumed that the 32,000 GWh of savings are net of about 15,000 GWh of energy efficiency believed to be "embedded" in the CEC's baseline demand forecast." Examination of the E3 model, as supported by the recent CPUC/CEC Final Decision, / shows that the Aggressive Case results in approximately 20,000 additional GWh of energy efficiency over the 16,450 GWh assumed to be embedded in the load forecast. The discrepancies between the agencies' understanding on this important assumptions highlights the need for continued coordination between the agencies as this issue is further explored.

In particular, ARB can help by acknowledging and supporting the role of the agencies and stakeholders with expertise in EE programs, including the development by those agencies and stakeholders of sector-specific and customer-specific programs and goals. In particular, ARB should acknowledge that the CPUC, CEC,

local governments, and public utilities will all be collaborating in the development of specific EE programs and goals for the 2012-2020 period, and the cost-effectiveness and feasibility of those goals on a customer-specific and utility-specific basis are still in development. Thus, the ARB's AB 32 goals will need to be adjusted and revised to take into account these revised goals and programs.

Key challenges in pursuing EE programs include:

- Standardized measurement, evaluation, and oversight of the EE measures across agencies (CPUC, CEC) and entities (POU, IOU).
- Energy Commission efforts to improve and increase compliance with codes and standards.
- A regular and more structured cycle for codes and standards review and updates which continually tighten the standards and continue to deliver more GHG reductions. This should apply both to building codes and for appliance standards. In addition new standards should be developed for a broader range of appliances such as electronics and other energy using devices.
- Addressing the continued challenges of lower federal energy efficiency standards relative to California (through state efforts at the national level).
- The securing of timely funding to provide IOUs an opportunity to meet the additional and ambitious EE targets.
- Complementary legislation such as AB 811, which allows any city to provide loans for EE and solar that can be repaid through tax assessments.

To attain the goals of AB 32 a roadmap needs to be developed that matches the POU and IOU EE strategic plans goals with the very ambitious ARB proposed EE targets. ARB can then monitor progress of those programs and the role they can play in achieving AB 32's overall emissions targets.

#### 4. Control of Natural Gas Emissions.

The Proposed Scoping Plan includes a measure to improve operating practices and replace older equipment of natural gas pipelines. The Plan states that this will save 0.9 MMT (or 2,230,000 MMBtu) at an annualized cost of \$0.5 Million and annualized savings of \$17.7 Million, estimated by applying the natural gas savings from the U. S. Environmental Protection Agency's ("EPA's") Natural Gas STAR program actions to a number of units in the current emissions inventory. PG&E was a charter member of EPA's Natural Gas Star program, having joined the program in 1994. Through our participation, we have been tracking the emissions reductions achieved through this program. Since 1994, PG&E has reduced over one million tons of CO<sub>2</sub>e. In our most recent estimates, total vented emissions from all sources were less than 1,000,000 MMBtu. Assuming that the other natural gas pipeline companies in California have similar emissions, fugitive emissions would have to be entirely eliminated to reach the ARB goal of eliminating 2,230,000 MMBtu of natural gas emissions. Completely eliminating fugitive emissions will be extremely difficult and is likely to cost far more than ARB estimates. PG&E agrees that a detailed industry survey is needed to determine the magnitude of potential costs and savings, and the Scoping Plan should reflect that the goals for fugitive emissions are still under development. We look forward to continuing to work with the ARB on efforts to reduce these GHG emissions.

#### C. Economic Modeling.

## 1. The ARB Should Conduct Cross Sector Cost-Effectiveness and Technological Feasibility Analysis For All Measures Across All Sectors.

The Scoping Plan correctly states that modeling results are highly dependent on input assumptions, and that these input assumptions vary in detail and quality (G 3, G 4). The cost estimates are likely to change during the regulatory process as the measures are further developed and analyzed.

As cost-effectiveness information will be developed for the measures, or will be refined for the few cases where such information exists, the ARB needs to have a process to continue systematic, cross-measure cost-effectiveness analysis through the regulatory process and into the implementation phase. This analytical process is necessary to understand how new information on the inputs changes the cost-effectiveness of a measure in comparison to the other measures. By undertaking this analysis, the ARB can ensure its responsibility that it pursues only those measures which are technologically feasible and cost-effective.

## 2. Additional Insights from the Economic Modeling

PG&E has identified serious drawbacks to the economic modeling that limit the utility of the results presented in the Scoping Plan. Continued economic modeling in the upcoming regulatory process will both improve the quality of the inputs and allow insight from comparing the results of various policy scenarios.

Economic modeling results are best used to compare various policy options. For example, the ARB could evaluate the use of additional amounts of \$10 or \$20 per ton offsets rather than implementing 33% RPS at \$133 per ton. The model impacts of this scenario on the economy versus the Scoping Plan case would provide meaningful insights.

The preliminary nature of the inputs combined with the dependence of modeling outputs on the measure cost-effectiveness suggests that model outcomes are not currently reliable. The ARB should continue to run the models with the improved input assumptions throughout the regulatory process, and beyond, to understand the economic ramifications of the Scoping Plan.

Certain aspects of modeling results cast additional doubt on the validity of the results. For example, all "command and control" options in BEAR and E-DRAM are shown to be more beneficial to the economy than the option that allows some cap and trade. This result appears contrary to the approach taken by ARB when it included additional energy efficiency and conservation in the cap-and-trade scenario. The counterintuitive result of the cap and trade option being more expensive requires explanation. Additionally, the modeling result of a carbon price of \$10 per ton is not reflective of the full cost of the AB 32 program. For example, the price of the 33% renewables measure is not included in this figure. Finally, the ARB has provided no evidence for why offsets were modeled at \$20 per ton. For example, PG&E has procured offsets for less than half this amount for its ClimateSmart program.

Thank you for the opportunity to submit these comments. We look forward to working constructively with ARB, other state agencies,

concerned stakeholders, and members of the public to tackle the challenge of global climate change and to ensure the successful implementation of AB 32.

Very truly yours,

/s/

John W. Busterud

JWB:kp:bd  
Attachment

Attachment: [www.arb.ca.gov/lists/scopingpln08/826-112508\\_ab\\_32\\_comments\\_with\\_various\\_previously\\_filed\\_comments\\_attached.pdf](http://www.arb.ca.gov/lists/scopingpln08/826-112508_ab_32_comments_with_various_previously_filed_comments_attached.pdf)

Original File Name: 112508\_AB 32 Comments with various previously filed comments attached.pdf

Date and Time Comment Was Submitted: 2008-11-25 15:28:34

No Duplicates.



**Comment 224 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Carol  
Last Name: Misseldine  
Email Address: cmisseldine@comcast.net  
Affiliation: Green Cities California

Subject: Comments on AB 32 Scoping Plan  
Comment:

Attached please find comments from Green Cities California (GCC) on the second draft of the AB 32 Scoping Plan.

Sincerely,

Carol Misseldine, Coordinator  
Green Cities California

Attachment: [www.arb.ca.gov/lists/scopingpln08/828-green\\_cities\\_california.comments\\_on\\_draft\\_ab\\_32\\_scoping\\_plan.11.25.08.doc](http://www.arb.ca.gov/lists/scopingpln08/828-green_cities_california.comments_on_draft_ab_32_scoping_plan.11.25.08.doc)

Original File Name: Green Cities California.Comments on Draft AB 32 Scoping Plan.11.25.08.doc

Date and Time Comment Was Submitted: 2008-11-25 19:39:42

No Duplicates.

## **Comment 225 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mitchell

Last Name: Bolinsky

Email Address: mbolinsky@id-usa.com

Affiliation: Interdynamics, Inc., an APRI Member

Subject: Statement of Concern for Punitive Effects of Upstream Fees on Cooperative Partners  
Comment:

November 25, 2008

To the Members of the California Air Resources Board:

The employees of Interdynamics, Inc., a U.S. manufacturer of products for consumer Do-It-Yourself maintenance and repair of automobile air-conditioning systems respectfully submit the following comments relating to the Revised Draft AB 32 Scoping Plan.

Interdynamics is a leading member of the Automotive Refrigeration Products Institute (ARPI) and a driving force in the mobile refrigeration industry, with a track record of environmental and social responsibility. Since 1992, we have supported reduced use and replacement of ozone depleting refrigerants such as R-12. ARPI members designed the unique can and fittings for R-134a and other SNAP approved, non-CFC refrigerants. We have also leveraged innovation to mitigate the environmental impact of our products by improving our packaging and inventing self-sealing dispensing valves.

Our company and trade groups have been working cooperatively for the past two years with the ARB's Research Division to craft proactive, effective and affordable solutions to mitigate climate change impacts associated with our consumer products. Our work with staff will directly yield a workable AB32 regulation, providing real emissions reductions and, at the same time, not disadvantaging low income Californians.

We are proud to have set a cooperative example for other industry groups to follow and look forward to further supporting Alberto Ayala, Richard Corey and Tao Huai's Research Division team at our upcoming January 22, 2009 Early Action Board hearing.

But our work has not been easy and will not have been achieved without significant cost. Our alternative measures plan includes:

- An industry-first, self-administered small-container return/recovery/recycling program with economic incentives for consumers to return used containers for processing.
- Development and commercialization of an industry-first self-sealing valve to mitigate accidental and installation emissions of refrigerant from small containers.
- A California-specific consumer education campaign, including

print and website.

We ask you to consider the costs and efforts expended by our company and industry in being amongst the first AB32 "cooperators".

Consider the potential punitive effects the Scoping Plan's proposed "upstream fees" could layer on top of the already significant costs borne by the first industry to voluntarily participate in a self-regulating exercise.

In early 2008, Interdynamics and ARPI had discussed with CARB staff the possibility of a fee in lieu of the regulation but were told that emissions reductions were the primary objective of AB32 measures. Now, on the eve of adoption of the regulation the prospect of a fee is raised, noting that an upstream fee would ensure that the climate impact of these substances is reflected in the total cost of the product. Since the fee will follow the regulation, the "total cost" of the products will have already increased exponentially.

We disagree with the fee on top of our newly-promulgated cooperative regulation and have grave concerns that such a fee penalizes us for our proactive approach.

Additionally, the Board and we recognize that incremental regulatory costs and fees are ultimately passed to consumers through higher product prices. This may precipitate a tipping point to render these products uneconomic, constituting a de facto product ban, thus ensuring an adverse impact on minorities and those on fixed incomes. This is contrary to the original objectives we and CARB staff had set out in the development of alternative regulations on the servicing of vehicle air conditioners by non-professionals.

In conclusion, please know that we support a balanced, cost-effective plan to reduce greenhouse gas emissions. Interdynamics and ARPI are already playing a meaningful role in helping the state meet its policy goals for reducing greenhouse gas emissions in California through participation in the early action rulemaking on Reduction of Refrigerant Emissions from Non-Professional Servicing and will continue its work with CARB staff on the rulemaking. We continue to stand ready, with the Board, to implement a regulatory scheme aimed at reducing greenhouse gas emissions while not devastating our industry. We want to be part of the solution, but not if the price is our businesses.

Thank you in advance for your attention, consideration and support. We welcome further discussing this issue with you and invite you to contact me for further information about this issue.

Sincerely,

Mitchell Bolinsky  
Director of Marketing  
Interdynamics, Inc.  
560 White Plains Road  
Tarrytown, NY 10591  
mbolinsky@id-usa.com  
office: 914/798-7932  
fax: 914/798-7971

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 06:52:24

No Duplicates.

## **Comment 226 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tink

Last Name: Jeffers

Email Address: tjeffers@alac.org

Affiliation:

Subject: Global Warming

Comment:

I'm sending this message to urge the CARB Board to give serious consideration to adopting a strong plan for California regarding global warming. We need immediate steps to be taken to reduce dangerous air pollutants, reduce smog, toxic emissions, and slow the increasingly devastating effects of global warming. We need an aggressive statewide plan to achieve action from local governments to reach state targets for greenhouse gas reduction, regulatory measures for reducing pollution from industrial sources, refineries and manufacturing facilities. The damage caused by our indifference to these issues in the past are clearly taking their toll. We must all breathe to live, please take strong measures to restore our environment and keep further dangerous effects from occurring.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 11:10:57

No Duplicates.

## **Comment 227 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael  
Last Name: Klein  
Email Address: mklein@efproducts.com  
Affiliation: EF Products, L.P.

Subject: Scoping Plan Comment about Upstream Mitigation Fees  
Comment:

November 26, 2008

Members of the California Air Resources Board:

The employees of EF Products, L.P., a U.S. manufacturer of products for consumer Do-It-Yourself maintenance and repair of automobile air-conditioning systems respectfully submit the following comments relating to the Revised Draft AB 32 Scoping Plan.

EF Products is one of the leading members of ARPI (the Automotive Refrigeration Products Institute) and a driving force in the mobile refrigeration industry. Since 1992, we have responsibly supported reduced use and replacement of ozone depleting refrigerants such as R-12. ARPI members designed the unique can and fittings for R-134a and other SNAP approved, non-CFC refrigerants and are currently working to support the industry's coming transition from R-134a and to a new, low-GWP refrigerant.

In the revised Scoping Plan, CARB identifies four Discrete Early Action measures to reduce greenhouse gas emissions of the refrigerants used in car air conditioners, semiconductor manufacturing, air quality tracer studies and consumer products. Also identified were reduction opportunities associated with commercial and industrial refrigeration, changes to the refrigerant used in auto air conditioning systems and ensuring that existing car air conditioning systems and stationary refrigeration equipment do not leak.

For the past two years, our company and trade associations have been working cooperatively with ARB's Research Division to craft proactive, effective and affordable solutions to mitigate climate change impacts associated with our products used by consumers to service mobile vehicle air conditioning (MVAC) systems. This work is very close to yielding a workable AB32 regulation that will provide real emissions reductions and, at the same time, not disadvantaging low income Californians.

We are proud to have set a cooperative example for other industry groups to follow and look forward to further supporting Alberto Ayala, Richard Corey and Tao Huai's Research Division team at our upcoming January 22, 2009 Early Action Board hearing. But our work has not been easy and will not have been achieved without significant cost. Our alternative measures plan includes:

- Development and commercialization of an industry-first

self-sealing valve to mitigate accidental and installation emissions of refrigerant from small containers.

- A first of its kind, self-administered small-can return/recovery/recycling program with economic incentives for consumers to return used containers for processing.
- A California-specific consumer education campaign, including print and website.

We ask you to consider the costs and efforts expended by our company and industry in being amongst the first AB32 "cooperators".

Consider the potential punitive effects the Scoping Plan's proposed "upstream fees" could layer on top of the already significant costs borne by the first industry to voluntarily participate in a self-regulating exercise.

In early 2008, EF Products and ARPI had discussed with CARB staff the possibility of a fee in lieu of the regulation. We were told that emissions reductions were the primary objective of AB32 measures. Now, on the eve of adoption of the regulation, the prospect of a fee is raised, noting that an upstream fee would ensure that the climate impact of these substances is reflected in the total cost of the product. Since the fee will follow the regulation, the "total cost" of the products will have already increased substantially.

We disagree with the fee on top of our newly-promulgated cooperative regulation and have grave concerns that such a fee penalizes us for our proactive approach.

Additionally, we must recognize that incremental regulatory costs and fees are ultimately passed to consumers through higher prices. This may render our products uneconomic, constituting a de facto product ban, creating an adverse impact on minorities and those on fixed incomes. This is contrary to the original objectives we and CARB staff defined in developing alternative regulations for servicing of MVACs by non-professionals.

In conclusion, you should know that we continue to support a balanced, cost-effective plan to reduce greenhouse gas emissions. EF Products and ARPI are already playing a meaningful role in helping the state meet its policy goals for reducing greenhouse gas emissions in California through participation in the early action rulemaking on Reduction of Refrigerant Emissions from Non-Professional Servicing and will continue its work with CARB staff on the rulemaking. We continue ready, with the Board, to implement a regulatory scheme aimed at reducing greenhouse gas emissions while not devastating our industry. We want to be part of the solution, but not if the price is our businesses.

Thank you in advance for your attention, consideration and support. We welcome further discussing this issue with you and invite you to contact me for further information about this issue.

Sincerely,

Michael J. Klein  
President and CEO  
EF Products / An IDQ Company  
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Phone: (972) 444-0422 ext.112

FAX #: (972) 831-8891

Attachment: [www.arb.ca.gov/lists/scopingpln08/833-arpi\\_ef\\_products\\_scoping\\_plan\\_comments\\_-\\_klein.112608.doc](http://www.arb.ca.gov/lists/scopingpln08/833-arpi_ef_products_scoping_plan_comments_-_klein.112608.doc)

Original File Name: ARPI EF Products Scoping Plan Comments - Klein.112608.doc

Date and Time Comment Was Submitted: 2008-11-26 11:13:45

No Duplicates.



## **Comment 228 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: gerald  
Last Name: cauthen  
Email Address: cautn1@aol.com  
Affiliation:

Subject: Implementation of AB 32  
Comment:

Hi Gary:

So far CARB has taken a hands-off position regarding the behavior of the transportation funding and implementation agencies. If this attitude persists it will leave a hole in AB 32 large enough for a fleet of diesel 18-wheelers.

MTC's enormous (\$222 billion over the next 25 years) capital program is dominated by highway-expanding projects and unproductive transit boondoggles. CARB says this is a SB 375 matter over which it professes to have no jurisdiction. Unfortunaty SB 375 exempts virtually the entire MTC program (Section 4 (b)(2)(K)).

That leaves AB 32....and CARB. CARB needs to step up to the plate and make a serious effort to reduce transportation's contribution to the GHG problem.

Jerry Cauthen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 11:27:15

No Duplicates.

**Comment 229 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Erin

Last Name: Rogers

Email Address: [erogers@ucsusa.org](mailto:erogers@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on Propsoed Scoping Plan

Comment:

Comments from the Union of Concerned Scientists on the Propsoed Scoping Plan are attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/835-ucs\\_comments\\_on\\_propsoed\\_scoping\\_plan\\_11-26-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/835-ucs_comments_on_propsoed_scoping_plan_11-26-08.pdf)

Original File Name: UCS comments on propsoed scoping plan 11-26-08.pdf

Date and Time Comment Was Submitted: 2008-11-26 12:26:03

No Duplicates.

**Comment 230 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Doug

Last Name: Kimsey

Email Address: cseghers@arb.ca.gov

Affiliation: Metropolitan Transportation Commission

Subject: AB 32 Proposed Scoping Plan

Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/scopingpln08/838-11\\_19\\_2008\\_mtc.pdf](http://www.arb.ca.gov/lists/scopingpln08/838-11_19_2008_mtc.pdf)

Original File Name: 11\_19\_2008\_MTC.pdf

Date and Time Comment Was Submitted: 2008-11-26 15:49:39

No Duplicates.

## **Comment 231 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael  
Last Name: Smith  
Email Address: mikesmith@wavecable.com  
Affiliation: City of Dixon

Subject: Comments on Air Resources Board Proposed Scoping Plan  
Comment:

Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95814

RE: Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

As the Vice Mayor for the City of Dixon, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan).

I am proud of the groundwork our energy strategic plan provides to reduce Dixon's greenhouse gas emissions (GHG emissions) and increased energy efficiency. Our upcoming general plan update will include both an energy and air quality strategic plan.

Dixon will soon have a proposal before the city council that could make Dixon's city government carbon neutral with no impact to our general fund. Therefore, with these efforts to date, I feel we can meet most of the intent of AB 32.

However, while in general support of a number of the programs and policies outlined in the Scoping Plan, within the control of local government, I withhold comments on the Scoping Plan appropriately allowing the SB 375 process to develop regional transportation-related GHG targets. Implementation of the regional planning processes in SB 375 are new and largely untested. The 5 MMT figure, while a place holder, nevertheless sets an appropriate benchmark that helps assure that the state can achieve its overall 2020 goal.

As both the state and local governments are faced with critical budget shortages, additional costs to heavily invest in GHG emission technologies in the next 2 to 3 years will become more burdensome for some local governments. However, many local governments can lead by example to reduce GHG, reduce the cost of government and create jobs when taking a long-term view. This should influence development design to a certain extent; the reality is that developers can build projects that will be cost effective and profitable when considering the project's lifecycle. I strongly encourage the ARB to consider these limitations and opportunities as it moves forward with the Scoping Plan

Thank you again for the opportunity to comment. While my term on the city council will expire this December, I look forward to working with the ARB in the future as an informed citizen.

Sincerely,

Michael C. Smith  
Vice Mayor

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-11-26 16:17:18

No Duplicates.

**Comment 232 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John  
Last Name: Cunningham  
Email Address: jcunn@cd.cccounty.us  
Affiliation: Contra Costa County

Subject: Comments on AB 32 Scoping Plan  
Comment:

See attachment.

Attachment: [www.arb.ca.gov/lists/scopingpln08/840-ccc\\_comments\\_on\\_ab32psp.pdf](http://www.arb.ca.gov/lists/scopingpln08/840-ccc_comments_on_ab32psp.pdf)

Original File Name: CCC Comments on AB32PSP.pdf

Date and Time Comment Was Submitted: 2008-11-26 16:51:38

No Duplicates.

## **Comment 233 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Timothy

Last Name: Rood

Email Address: tsr12@columbia.edu

Affiliation:

Subject: AB32 needs Smart Growth Incentives to Work

Comment:

Current growth patterns put the state on a path that will result in a 50-70 percent increase in driving over the next 30 years. Such an increase in driving would cancel out the emissions benefits of improved fuel economy and low carbon fuels. It is imperative that the state provide strong leadership and encourage local and regional governments to adopt ambitious targets for greenhouse gas reductions.

The goal for the land use sector should be 11-14 MMT. A September 2008 scientific analysis by Dr. Reid Ewing and Dr. Arthur C. Nelson, leading experts on smart growth and climate change, finds that a target of 11-14 MMT is achievable and advisable. An 11-14 MMT target would encourage new communities to be walkable, affordable, and to have great transportation choices while a lower target would encourage business as usual.

The Scoping Plan should include adoption of a statewide Indirect Source Rule (ISR) for carbon dioxide. ISR, already in effect in the San Joaquin Valley for air pollution, is a proven policy tool that helps developers and planners calculate and mitigate the impacts of projects.

The plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 11:52:15

No Duplicates.

## Comment 234 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Mike  
Last Name: Daley  
Email Address: mdaley@eahhousing.org  
Affiliation: EAH Housing

Subject: CARB should set a goal of 11-14 MMT from Smart Growth  
Comment:

THE MISSION OF EAH HOUSING is to create community by developing, managing and promoting quality affordable housing.

Affordable housing is a key component of achieving lower VMT.

Higher smart growth goals will help to ensure that legislation such as SB 375 will have the resources behind it to truly support affordable housing in smart growth planning.

CARB should set a goal of 11-14 MMT and send a clear signal that new communities should be walkable, affordable, and have great transportation choices.

A September 2008 scientific analysis by Dr. Reid Ewing and Dr. Arthur C. Nelson, authors of Growing Cooler, the definitive scholarly text on urban development and climate change, finds that a target of 11-14 MMT a year is achievable with policies California is already contemplating (the Ewing Report is available at [www.climateplan.org](http://www.climateplan.org)).

A target of 11-14 MMT translates to a very modest reduction in driving in 2020 - less than four miles per day per licensed driver.

-----  
**BACKGROUND ON AFFORDABLE HOUSING AND INFILL**

the inclusion of affordable housing is a crucial aspect in this model of new infill development.

Tim Frank of the Sierra Club has said that "all affordable housing is green," with an awareness that mixed-income communities help alleviate the traffic, congestion, and pollution that arise from commuting by those pushed to the margins. We have seen this in a number of communities where market rate infill development has both priced out working people and created more service jobs filled by people who cannot afford housing nearby.

The development community is ready to meet the market demand for infill development. But we face barriers: local governments need resources to plan and zone for climate-friendly development, and developers and local governments alike lack funding and financing options for building mixed-income infill developments and the infrastructure needed to support them.

The AB 32 Scoping Plan is a major opportunity to provide leadership and set policy direction not only to reduce greenhouse



gas emissions, but also to meet Californians' demands for relief from high gas prices through shorter commutes and affordable homes in walkable neighborhoods. Therefore, we urge you to:

1. Plan for higher CO2 reductions from smart transportation and land use planning.
2. Focus state capital programs to provide funding to local governments and developers that are planning for and building development that reduces VMT.

The Bay Area's Metropolitan Transportation Commission has adopted a target of reducing greenhouse gas emissions to 40% below 1990 levels by 2035 through land use and transportation planning. MTC has set a VMT reduction goal of a 10% per-capita decrease by 2035, compared to an anticipated increase of 10% if no action is taken. The state should match the leadership that is already happening throughout the state by making VMT reduction a significant part of California's climate strategy and providing the resources needed to make it happen. Models for these actions can be found around the state, and those that maintain a commitment to including households of all incomes in the planning stages hold the most potential for everybody's future.

Attachment: [www.arb.ca.gov/lists/scopingpln08/847-ab\\_32\\_scoping\\_plan\\_support\\_letter\\_md\\_v2.doc](http://www.arb.ca.gov/lists/scopingpln08/847-ab_32_scoping_plan_support_letter_md_v2.doc)

Original File Name: AB 32 Scoping Plan Support Letter MD V2.doc

Date and Time Comment Was Submitted: 2008-12-01 11:59:39

No Duplicates.

## **Comment 235 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Wafaa

Last Name: Aborashed

Email Address: Healthysl@yaho.com

Affiliation: Healthy880 communities-SL

Subject: AB32 Scoping Plan to reduce GHG emissions in CA

Comment:

Healthy 880 Communities-San Leandro strongly support reducing GHG emissions from heavy-duty trucks as part of meeting our AB32 climate change goals. Adopting basic improvements to heavy-duty truck rolling resistance and aerodynamic drag can reduce greenhouse gas emissions while providing co-benefits of reduced NOx emissions and operating costs. Through increased fuel efficiency, installing these devices will result in a payback of upfront costs after only 2-3 years. However, the measure could achieve even greater emission reductions. We urge ARB to consider expanding some of the provisions and to commit to revisiting the requirement for new vehicles.

We recognize the challenging economic times that the state and the nation are facing as the Board is presented with these two regulations that will affect thousands of businesses in California. The budget crisis also exacerbates the health and other problems created by diesel pollution. Families now, more than ever, are faced with tough decisions about whether to go to work or stay home and care for their loved ones, and of how to pay for health care and hospital costs.

We are also concerned by recent actions by staff to disregard Board Resolution 03-22. The 2003 Board Resolution directed ARB staff to adopt rules to achieve major reductions from diesel trucks by 2010 with very specific targets for VOC and NOx reductions in 2006 and 2010. ARB

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 12:12:24

No Duplicates.

**Comment 236 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sid

Last Name: Abma

Email Address: Sidelusa@aol.com

Affiliation: Sidel Systems USA Inc.

Subject: Scoping Plan

Comment:

Good day ARB

Last year we submitted a letter (see attached) for consideration.

It has to do with increasing natural gas energy efficiency. For every therm of natural gas energy saved, 11.8 lbs of CO2 will not emitted be emitted into the atmosphere.

Are we trying to combat global warming? Instead of 300,400,500 degree F exhaust temperatures being exhausted out of these chimney's, why not encourage companies and our government to recover this waste energy and have these flue gases leaving the chimney's at less than 100 degrees F when possible.

I look forward to your reply.

Attachment: [www.arb.ca.gov/lists/scopingpln08/849-ca\\_air\\_resources\\_board.doc](http://www.arb.ca.gov/lists/scopingpln08/849-ca_air_resources_board.doc)

Original File Name: CA Air Resources Board.doc

Date and Time Comment Was Submitted: 2008-12-01 12:21:09

No Duplicates.

## **Comment 237 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Leonard

Last Name: Grech

Email Address: lgrech02@sprintpcs.com

Affiliation:

Subject: There is a necessity to write REGULATIONS

Comment:

In 1985 I introduced to a leading manufacturer of Commercial cooking Equipment a simple technology to STOP the wastage of Natural Gas, caused by the habit of the kitchen staff of commercial kitchens leaving the burners ON running IDLE.

On a national bases this will produce approximately 138,000,000 Tons of CO2 production, EVERY YEAR

The heat produced from the production of the 138,000,000 Tons of CO2 will cause an additional 278,000,000 Tons of CO2 being produced through Air Conditioning load. Together this adds up to 416,000,000 Tons of CO2 production-> EVERY YEAR-> ALMOST TWICE THE REDUCTION OF THE KYOTO REQUIREMENTS--> The end users save money the Commercial Range manufacturers make money. All parties involved will make money from a simple technology to shut down idle burners. It will also demonstrate that there are many such ways of reducing energy and preventing pollution, even before we look at curtailing energy that is being put to good use.

The President of Vulcan Hart and the CEO of Garland who claim to be the biggest Commercial Range Manufacturers in the world, wanted to come out with this technology together. Their engineering department went against their President in Vulcan Harts case and the CEO of Garland, even after a preliminary production Heavy Duty Two Burner Counter Top Unit built by me and was presented to the President of Vulcan Hart.

I feel that it is my responsibility to do what I can to help turn back Global Warming. This technology or a similar technology will help do that.

This technology was under funded by the Department of Energy (DOE) and I tried to continue the project by taking on debt, until I could not afford to continue.

THE REAL PROBLEM IS THAT THE DOE PROJECT WAS TO REBUILD THE ORIGINAL TWO BURNER UNIT AND BUILD A HEAVY DUTY SIX BURNER RANGE.

THE TECHNOLOGY WAS TO BE CERTIFIED BY (CSA) AND THEN SENT UP TO THE PACIFIC GAS AND ELECTRIC FOOD TECHNOLOGY KITCHEN FOR A REAL LIFE TESTING IN THEIR RESTAURANT KITCHEN.

IF THE SIX BURNER RANGE COMPLETED ALL OF ITS TEST WITHIN THE ENVELOPE OF A VIABLE COMMERCIAL COOKING APPLIANCE THEN THAT INFORMATION WOULD HAVE BEEN DISTRIBUTED TO INTERESTED PARTIES.

THE TWO LEADING RANGE MANUFACTURERS ALREADY KNEW THAT THE SYSTEM WAS VIABLE. THEY ALSO KNEW THAT THE END USERS WANTED TO HAVE BETTER CONTROL OVER THEIR OPEN FACED BURNERS.

THE VICE PRESIDENT OF ONE OF THE GIANTS IN THE HOTEL INDUSTRY COMMUNICATED TO THE MANUFACTURERS THEIR DESIRE TO HAVE THIS TYPE OF TECHNOLOGY--> TO THE POINT OF HAVING A MEETING WITH THE HEAD OF SALES. THE MANUFACTURERS DISMISSED THEIR PETITION FOR SUCH A TECHNOLOGY.

THIS MEANS THAT IF ARB OR CALIFORNIA ENERGY COMMISSION WAS TO FUND THIS TECHNOLOGY OR ANY OTHER TECHNOLOGY I ANY FIELD OF ENDEAVOR AND IT MEET ALL THE REQUIREMENT AS LAID OUT BY ARB AND OR THE CALIFORNIA ENERGY COMMISSION, THEIR IS A VERY GOOD POSSIBILITY THAT THOSE INDUSTRIES THAT THE TECHNOLOGY WOULD HAVE TO BE INCORPORATED INTO WOULD NOT USE THE TECHNOLOGY AND CONTINUE ALONG MANUFACTURING THE SAME OLD POLLUTING PRODUCTS.

THE TECHNOLOGY THAT I HAVE DESCRIBED IS DESPERATELY WANTED BY END USERS, HOWEVER WHEN END USERS WANT TO OPEN A NEW KITCHEN THEY HAVE TO BUY WHAT THE MANUFACTURERS MAKE AVAILABLE.

TO GO WITH THE ASSUMPTION THAT MARKET FORCES WILL DICTATE THAT THE MANUFACTURERS IN THIS CASE AND IN MANY OTHERS THAT YOU HAVE FUNDED OR WILL FUND,--> WILL ADOPT THE NEW TECHNOLOGY IS EXTREMELY MISGUIDED.

IF A TECHNOLOGY MEET ALL REQUIREMENT SET OUT BY ARB, OR THE CALIFORNIA ENERGY COMMISSION OR DOE, THEN AFTER A SET PERIOD USED TO MAKE THE MANUFACTURERS AWARE OF THE TECHNOLOGY AND THAT PENDING LEGISLATION IS COMING, IF THEY DO NOT ADOPT IT THEN YOU HAVE TO BE COMMITTED TO SIGN THE LEGISLATION MAKING IT MANDATORY THAT A TECHNOLOGY OF SOME TYPE MUST BE ADOPTED THAT WILL PRODUCE THE SAME RESULTS AS THE TECHNOLOGY THAT ANY OF THE ABOVE GROUPS NAMED HAVE FUNDED. GIVING A SPECIFIC TIME FRAME FOR ADOPTION OF THE POLLUTING AND OR ENERGY REDUCING TECHNOLOGY.

IN 1985 GIVEN TWO YEARS FOR DEVELOPMENT 1987 THE UNITED STATES COULD HAVE STARTED ON A SIMPLE ROAD THAT LONG BEFORE NOW WOULD HAVE REDUCED THE CO2 PRODUCTION IN THIS COUNTRY BY 400,000,000 TONS, EVERY YEAR

PLEASE CONTACT ME IF YOU HAVE ANY QUESTIONS, I HAVE SPENT MOST OF THE YEARS SINCE 1985 WORKING TO GET THIS TECHNOLOGY INTO THE MARKET PLACE -->IT IS TIME YOU DID YOUR PART.

Leonard Grech

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 15:17:13

No Duplicates.

**Comment 238 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mary

Last Name: Pitto

Email Address: mpitto@rcrcnet.org

Affiliation: Regional Council of Rural Counties

Subject: AB 32 Climate Change Proposed Scoping Plan

Comment:

Please find attached comments from the Regional Council of Rural Counties on the AB 32 Climate Change Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/881-120108\\_ltr\\_scopingplan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/881-120108_ltr_scopingplan_comments.pdf)

Original File Name: 120108 ltr scopingplan comments.pdf

Date and Time Comment Was Submitted: 2008-12-01 16:13:13

No Duplicates.

**Comment 239 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dana

Last Name: Palmer

Email Address: dpalmer@manatt.com

Affiliation: Manatt, Phelps & Phillips, LLP

Subject: Comments of LA County on Proposed Scoping Plan

Comment:

Please see attached comments from the County of Los Angeles on CARB's Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/882-final\\_la\\_county\\_comments\\_on\\_revised\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/scopingpln08/882-final_la_county_comments_on_revised_scoping_plan.doc)

Original File Name: Final LA County Comments on Revised Scoping Plan.DOC

Date and Time Comment Was Submitted: 2008-12-01 16:28:12

No Duplicates.



## **Comment 240 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Andrew  
Last Name: Michael  
Email Address: amichael@bayareacouncil.org  
Affiliation: Bay Area Council

Subject: Updated Comments on Scoping Plan  
Comment:

Mary Nichols  
Chair, California Air Resources Board  
Sacramento, CA 95814

Bay Area Council Updated Comments on AB 32 Draft Scoping Plan  
(Please see attachment for full discussion of Scoping Plan)

Dear Chair Nichols:

The Bay Area Council appreciates the opportunity to provide comments on the proposed scoping plan recently released by the California Air Resources Board. We applaud the greater emphasis on the role of land use to reduce greenhouse gas (GHG) emissions, and the recognition that local governments are essential partners in the fight against global warming.

More than doubling the land use goal, from 2 MMTCO<sub>2</sub> to 5 MMTCO<sub>2</sub>, is an important step forward, and with that as an objective, we recommend that the Cap and Trade on Greenhouse Gas Emissions be implemented with urgency in conjunction with the Western Climate Initiative. The Cap and Trade Market will provide an economic incentive for emissions reduction and the reduced costs for market participants can further innovation and technology implementation to reduce energy use and emissions.

The recommendations on implementing the Low Carbon Fuel Standards and reducing emissions of future cars taken together will drive the innovation necessary to meet the 2050 reduction target.

The draft scoping plan reduces the local government reduction target from 2 MMTCO<sub>2</sub> in 2020 in the draft scoping plan to zero in the Proposed Scoping Plan. The ARB should re-consider providing reductions from local governments in their accounting or sector specific policies by including real tools, mandates, incentives - including offset project credits for those reductions outside of the cap and trade program - and specific guidelines that will help local governments enforce and scale up existing efforts, thereby enabling them to act as allies in statewide GHG reductions.

The Bay Area Council comments on supportive actions are broken into applicable sections and are as follows: Overview, The Goals, Mandatory Reporting, Implementing a Cap and Trade System, Coordinate Investments in Clean Tech and Energy Efficiency, Relevant Fee and Public Goods Charge in Transportation and Water,

and Early Action Credit.

Be well,

Andrew Michael  
Vice President Sustainable Development  
Bay Area Council

Attachment: [www.arb.ca.gov/lists/scopingpln08/883-bac\\_ab\\_32\\_comments\\_pge\\_chevron\\_edits\\_25\\_nov.doc](http://www.arb.ca.gov/lists/scopingpln08/883-bac_ab_32_comments_pge_chevron_edits_25_nov.doc)

Original File Name: BAC AB 32 comments PGE Chevron edits 25 Nov.doc

Date and Time Comment Was Submitted: 2008-12-01 16:39:19

No Duplicates.

**Comment 241 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: Southern California Public Power Author

Subject: Southern California Public Power Authority Comments on Proposed Scoping Plan  
Comment:

Please find attached the Southern California Public Power Authority  
Comments on Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/884-300226001nap12010801.pdf](http://www.arb.ca.gov/lists/scopingpln08/884-300226001nap12010801.pdf)

Original File Name: 300226001nap12010801.pdf

Date and Time Comment Was Submitted: 2008-12-01 17:01:43

No Duplicates.

## **Comment 242 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jon  
Last Name: Spangler  
Email Address: hudsonspangler@earthlink.net  
Affiliation: member: Transform, EBBC

Subject: Final AB 32 Scoping Plan Needs More Stringent "smart growth" standards  
Comment:

Dear CARB members,

Thank you for your hard and innovative work on this Final Scoping Plan for AB32. I hope that you will adopt the following suggestions in order to further improve the plan and reduce California's greenhouse gas (GHG) emissions by 2050. These comments are based on research and analysis supported by Transform (formerly the Transportation and Land Use Coalition), to which I belong. As a second-generation California native born in Redwood City, I have witnessed many decades of sprawl and increasing congestion in the Bay Area during my 56 years. I strongly urge you to adopt more stringent GHG reduction goals for 2020, especially in reducing urban sprawl and creating more walkable, livable cities.

The proposed AB32 Final Scoping Plan is a big improvement over the June draft plan, but more stringent smart growth/compact growth standards need to be implemented now in order to meet AB 32's 2050 carbon emissions goals.

On October 15th, the California Air Resources Board (CARB) unveiled its final recommendations for reducing greenhouse gas emissions under AB32 (the Global Warming Solutions Act). The state has made major progress by doubling the 2020 land use emission reduction target in this latest draft: the new goal is 5 million metric tons (MMT) more than twice the 2 MMT goal in the June draft. The Plan also calls on all local governments to reduce their emissions by 15% over current levels by 2020. The Plan coordinates well with SB 375, and defers to SB 375 in establishing regional targets.

Still, a more ambitious goal is needed, and a more diverse and accurate suite of analytical tools should be utilized to reach that goal.

CARB should set a land use goal for 2020 of 11-14 MMT and send a clear signal that new communities should be walkable, affordable, and have great transportation choices. A September 2008 scientific analysis by Dr. Reid Ewing and Dr. Arthur C. Nelson, authors of *Growing Cooler*, the definitive scholarly text on urban development and climate change, finds that a target of 11-14 MMT a year is achievable under policies that California is already contemplating. (The Ewing Report is available at [www.climateplan.org](http://www.climateplan.org).)

A target of 11-14 MMT translates to a very modest reduction in driving in 2020 - less than four miles per day per licensed driver. Regions around California have already adopted plans that will

reduce GHGs by 7.1 MMT by 2020, according to Stanford University's Jim Sweeney.

CARB must set a higher 2020 target for land use in order to put California on track to meet the 2050 target. We cannot afford another 10 years of business-as-usual development. If CARB sets a low 2020 target for land use, the resulting 10 more years of sprawl will make it impossible to reach our 2050 target. (The current 5 MMT target equates to a 4% VMT reduction by 2020 - less than half of what is needed to keep California on track. The current 5 MMT target equates to a 4% VMT reduction by 2020 - less than half of what is needed to keep California on track.)

The methodology CARB used to generate their current 5MMT estimate is not sufficiently accurate or broadly based as one might hope, given the gravity of the problem. Unfortunately, CARB drew on only one UC Berkeley report to generate its estimate of reductions and develop the 5 MMT goal for 2020. The regional model simulations in the UC Berkeley report are widely acknowledged to understate the benefits of dense, mixed-use development. (Even the author of the UC Berkeley report criticizes the models in her study: "the results confirm that even improved calibrated travel models are likely to underestimate VKT [vehicle kilometers traveled] reductions from land use, transit, and pricing policies. These models simply are not suited for the policy analysis demands in the era of global climate change.")

CARB should base its estimate on more than one source and examine a more recent report from the authors of *Growing Cooler*, which suggests that reductions of 11-14 MMT are possible by 2020 (The Ewing Report). The Ewing Report is based on California data for a 20-year historical period, and is far more realistic in its projections than the UC Berkeley report's series of regional modeling studies based on data from different states and nations with widely differing circumstances.

CARB should also adopt a statewide Indirect Source Rule (ISR) for carbon dioxide. The indirect source rule, already in effect in the San Joaquin Valley for air pollution, is a proven policy tool that helps developers and planners calculate and mitigate the impacts of projects. An ISR creates a local revenue fund to help local governments implement Climate Action Plans. Rural non-metropolitan (MPO) counties are excluded from SB 375, so ISR would be the only tool that rural counties can use to address the GHG impacts of land use.

Investing in and sustaining public transportation systems should also be a top priority in the final AB 32 Scoping Plan, in order to improve transportation efficiency and reduce congestion. When transit is convenient and reliable, people choose to use it: when Bay Area residents both live and work within 1&#8260;2 mile of transit, 42% of them ride it to work.

In addition to reducing vehicle miles traveled (VMT), smart growth also reduces greenhouse gas emissions by preserving landscapes that sequester carbon, such as forests, agricultural lands, and oak woodlands. CARB should establish guidelines for quantifying the emission reduction benefits of preserving these landscapes, and for mitigating the GHG emissions and loss of sequestration resulting from conversion. There are a number of possible mechanisms for

implementing this strategy, including SB 375, CEQA, and Indirect Source Review. Many of California's carbon-capturing landscapes are outside of MPOs, and are therefore not covered by SB 375. CARB should ensure that additional policy measures are adopted that apply to these rural counties.

SB 375 and other land use measures should be coordinated with the sustainable forestry measures to avoid duplicative efforts and maximize benefits in both sectors.

The Final Scoping Plan has failed to adequately respond to concerns raised by the EJAC and public health community. CARB should adopt the EJAC's recommendations to increase the 2020 target for land use, invest in public transit in low-income communities, and create incentives for local governments to reduce their emissions. The public health analysis should include specific data about public health impacts associated with community design, including impacts on obesity, chronic disease and public safety. CARB should ensure that the public health community has an ongoing, formal role in shaping AB 32 policy.

Smart growth is a net economic benefit for California, according to a recent analysis by Stanford University's Jim Sweeney. Californians want and need to live closer to jobs and public transportation choices because smart growth will free them from high gas prices. The cost of driving a mile in the U.S. nearly doubled between 2002 and 2007. The Sacramento Region (SACOG) estimates their smart growth blueprint will save \$16 billion in infrastructure costs by 2030.

Thank you again for your efforts to reduce global warming statewide. I hope you will adopt these and other suggestions in order to make reaching the 2050 climate change goals a reality.

Respectfully submitted,

Jon Spangler  
1037 San Antonio Avenue  
Alameda, CA 94501-3963

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-01 20:57:35

No Duplicates.

## **Comment 243 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard

Last Name: Davis

Email Address: mt.pockets2@roadrunner.com

Affiliation:

Subject: CARB to adopt DTACC proposal

Comment:

The economy is in such drought it effect us all. And the work in California especially the construction end directly affects me along with Thousands of other Small Fleet Owners. The work just isn't there to justify the upgrade of equipment now, There Just isn't anyway to afford a \$150,000 dollar piece of equipment when I'm only struggling with \$3,000.00 income a month now and shrinking. I've had to get a night job to try to survive and that is slowing down and might even be out of a job by years end. With my savings I can only survive another 4 months and then I'm done California can't afford MORTE unemployment and need to just SUCK IT UP and put this outrageous proposal aside till the economy picks up. My original plan was to up date my truck by 2015 before CARB went wacky and economy south now we can only wait and try to survive till it gets better. Believe me the majority of us would like a new truck but ONLY when economics can assure it

Thanks for your time  
Richard D. Davis  
JDSR company  
Nuevo, Ca

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 00:17:51

No Duplicates.

## **Comment 244 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom

Last Name: Brown

Email Address: tbrown@capseal.com

Affiliation: Cap & Seal Co.; ARPI; AAIA

Subject: Scoping Plan - Fee on 134a Refrigerant

Comment:

Comments to the California Air Resources Board  
From Cap & Seal Co., Inc.  
Regarding the Revised Climate Change Draft Scoping Plan  
December 1, 2008

Cap & Seal Co., Inc. is the manufacturer of threaded tops and gaskets for refrigerant cans as well as rupture discs for refrigerant cylinders. We submit the following comments on the Revised Draft AB 32 Scoping Plan.

While we understand that the Scoping Plan is only a road map for climate change policy in California, and that the place to take up the specifics of the recommendations is within the respective rulemakings that will follow within each sector, we have grave concerns over the fact that CARB is also proposing to establish an upstream mitigation fee on the use of high GWP gases, a fee that will ultimately be passed on to consumers through higher product prices IN ADDITION TO a very complex and involved recycling program for small cans of refrigerant. The extra cost of the two programs could put refrigerant out of reach for the very people we are trying to provide alternatives for, the working and jobless middle class and poor of your state.

In the revised Scoping Plan, CARB identified four Discrete Early Action measures to reduce greenhouse gas emissions from the refrigerants used in car air conditioners, semiconductor manufacturing, air quality tracer studies, and consumer products. CARB has also identified additional potential reduction opportunities based on specifications for future commercial and industrial refrigeration, changing the refrigerants used in auto air conditioning systems, and ensuring that existing car air conditioning systems as well as stationary refrigeration equipment do not leak.

We support a balanced, cost-effective plan to reduce greenhouse gas emissions. Cap & Seal, working through ARPI is already playing a meaningful role in helping the state meet its policy goals for reducing green house gas emissions in California through participation in the early action rulemaking on Reduction of Refrigerant Emissions from Non-Professional Servicing.

For two years we have worked with staff collaboratively and in good faith to develop a draft regulation that will yield real emissions reductions, is workable, and yet does not disadvantage low income Californians or communities of color. Importantly, the



draft regulation should achieve an objective cost effectiveness measure. But it hasn't been easy and it won't be without additional cost to the consumer.

Nevertheless, even with the reductions from the specific high GWP measures described above, the Scoping Plan would layer on top of the regulation an upstream fee for all refrigerant sold. ARPI discussed with CARB staff the possibility of a fee IN LIEU OF the regulation, but were told that emissions reductions were the objective. Now, on the eve of adoption of the regulation the prospect of a fee is raised IN ADDITION TO our mitigation proposals.

The Plan notes that an upstream fee would ensure that the climate impact of these substances is reflected in the total cost of the product. Since the fee WILL FOLLOW the mitigation regulations, the "total cost" of our products will have already increased exponentially.

And to add insult to injury, the Plan states that this mitigation fee would "complement" the downstream high GWP regulations currently being developed. We suspect that the result of a substantial fee in addition to the extra cost of the recycling and packaging improvements will be destruction of markets and economic hardship for both ARPI companies and Californians. We also anticipate the creation of increased smuggling activity in refrigerant, both in small cans and cylinders, from Mexico and neighboring states because of this proposed fee.

During the conversion to R134a from R12, a national "floor tax" was put on R12 to encourage conversion to 134a. This was mostly effective but caused a situation where honest manufacturers were being pushed out of markets by smugglers. R12 became the second most trafficked item across the borders, second only to illegal drugs. There were instances of full ISO containers being smuggled as well as intentionally mismarked 30 lb cylinders and falsified certifications. It would be advisable to speak with US Customs yourselves about their opinion this idea to create a market for illegal 134a before you ask them for their help in this matter. You will certainly need all the enforcement help you can get.

Adding a large fee to the increased cost of a newly promulgated regulation that involves a product container redesign, a reclamation program and an extensive education regime is not complementary. It is punitive. It could render the product line uneconomic and constitute a de facto product ban, thus ensuring an adverse impact on minorities and those on fixed incomes. This was exactly the result ARPI members were seeking to avoid through the development of an alternative regulation on the servicing of vehicle air conditioners by non-professionals.

We wonder why the Plan would suggest that revenues from this fee could be used to mitigate greenhouse gas emissions either from other high GWP compounds or other greenhouse gases instead of to offset the costs associated with compliance with the regulatory regime noted above. We rather think that a good bit of the money collected will be needed for enforcement activities to keep illegal refrigerant out of California.

ARPI companies will continue to work with CARB staff on the rulemaking. Rest assured that we also stand ready to work with the Board to implement a regulatory scheme aimed at reducing greenhouse

gas emissions while not devastating our industry. We want to be part of the solution, but not if the price is our businesses.

Respectfully Submitted,

Thomas J. Brown  
President  
Cap & Seal Co., Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 08:48:00

No Duplicates.

**Comment 245 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: LA County Integrated  
Last Name: Waste Management Tas  
Email Address: taskforce@ladpw.org  
Affiliation:

Subject: LA County Integrated Waste Task Force - Comment letter on AB 32 Proposed Scoping Plan

Comment:

On behalf of the Los Angeles County Integrated Waste Management Task Force, attached is the Task Force's letter regarding measure #15 "recycling and waste" of the Climate Change Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/890-task\\_force\\_ab\\_32\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/890-task_force_ab_32_proposed_scoping_plan.pdf)

Original File Name: Task Force\_AB 32 Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-02 16:20:59

No Duplicates.

## **Comment 246 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Joel

Last Name: Ellinwood

Email Address: joel.ellinwood@lawyer-planner.com

Affiliation: Land Use and Environmental Attorney

Subject: Comments on Scoping Plan - Regional Transportation Target

Comment:

As a land use and environmental attorney I have followed the development of the Scoping Plan and the regional transportation target closely. I do not have a client and I am not representing any particular interest group or organization, but am commenting on based on my personal views and professional judgment.

SB 375 requires CARB to participate in a collaborative process to set regional targets for 2020 and 2035. The variables between the diverse regions of California are so extreme that without being fully informed about them it would be presumptuous to set targets that are either too high or too low for the state in the aggregate.

The basis for setting CARB's projected overall goal for 2020 has serious flaws, in that it is based on a "business as usual" projection from the 2002-2004 average level of emissions to 2020. The projections for GhG emissions for the transportation sector are made using the EMFAC2007 program, and it incorporates an assumed increase in VMT in excess of population, which has been a historical trend. The data from CARB's GhG inventory from the last period of sustained economic distress in California, 1990-1996, shows that GhG from the transportation sector actually declined by 4% during that period, and adjusting for population growth, per capita GhG emissions declined by 10%. Presumably the same trends in per capita VMT growth and population used in projections for the Scoping Plan were still functioning -- why then did GhG in absolute terms and in per capita decline in this period?

I inquired about the availability of data for 2005 and 2006, which would begin to reflect the slow-down in the housing market, before its precipitous drop that occurred in 2007-2008. I am told that data won't be available until January.

If history is any predictor of what we might expect to learn from more current data, the sharp decline in the economy will result in a significant decrease in VMT and GhG, whether or not any tighter regulatory programs are adopted. When gasoline prices peaked earlier this year, Sacramento Regional Transit reported a 25% increase in ridership over the previous year. Now that gas prices have declined, fewer workers in large sectors of the economy in construction, real estate, finance and related fields are commuting because many have no jobs to which to commute.

It is difficult to predict how long the current slump will last, but the scope of the problem appears to be much greater than the fundamentals involved in the 1990-1996 downturn. Many experts are

predicting that housing will not begin to recover for at least another 3 to 5 years.

One implication of this sobering reality is probably good news, insofar as the predicted increase in GhG in the "business as usual" scenario is likely significantly overstated. This will provide more time to get a broad-based and locally fine-tuned program to maximize benefits from transportation and land use changes put in place for each region. Some regions are prepared to initiate higher target from within. Other regions will face much more serious challenges finding the resources to develop the systems to support the changes needed. Forcing higher targets across the board when serious questions exist about the need and the ability to achieve meaningful results due to slow rates of growth is poor policy.

There is considerable confusion about what measures will be expected to change VMT growth and land use development patterns that can result in significant GhG reductions. For the 2020 time frame, land use will not have had time to make a significant change in the built environment because of lower rates of growth. Other measures in the transportation policy toolkit that could have a more rapid impact, such as congestion pricing, restrictions on parking and improved transit and ride share programs in part funded by the revenues from those charges, a "carbon tax" floor on gasoline prices, are not within the legal authority of counties, cities or regional transportation planning agencies to impose.

The slow-down significantly effects the amount of GhG reduction that can be realized from new patterns of development (or forecast from continuing sprawl development) because the fraction of the addition to the existing built environment that occurs annually will be cut by about 1/2, or even more. There are about 13 million dwelling units in California. At the most recent peak of construction, only about 150,000 single family homes and 60,000 multi-family units were built (2004), altogether less than 2% annual addition to the existing built environment. By 2006, single-family home production dropped about 104,000 units and less than 100,000 in 2007. October of 2008 saw the fewest number of residential building permits since records began to be kept in 1979, 27% less than the prior year. In 1993 and 1995 the total number of new units constructed was only about 85,000. That level of production of new units appears likely to continue for at least another year or two.

The relative benefits of GhG reduction from leveling or decline in VMT from new development and population growth also shrink as the vehicle fleet becomes more efficient. Although the forecasts show that fuel economy and other technological fixes in gasoline powered vehicles is overwhelmed if per capita increase in VMT continue to exceed the rate of population growth, it also assumes that development will continue to follow less efficient, auto dependent sprawl development patterns. A number of structural changes in the housing market soften the viability of this assumption. The shock of high gasoline prices, however temporary in the short run, and the tightening of credit, plus the aging of the baby boom generation as "empty nesters" all have resulted in turning market demand to smaller units on smaller lots and other higher density product with urban amenities.

In short, "business as usual" is seldom "usual" for very long. Events have occurred in the economy and finance sector which were not included in the forecasting assumptions used to project

emissions growth from the 2002-2004 average (a market cycle peak) to 2020 are clearly not valid. The maxim to "drive 'till you qualify" that fed the exurban residential growth boom and explosion of VMT is now inoperative. The forces that impelled that type of development (high land costs and difficulty and cost of development in existing urbanized areas meaning home prices exceed consumer ability to pay) will not be addressed by policies that drive up the cost of exurban housing above the realm of relative affordability. Proponents of the view that the problem and solution is merely a choice in urban form fail to account for these fundamental economic realities. Suburban and exurban green field development was the path of lowest cost and least resistance to providing housing Californians could afford. Putting a cork on that bottle will only increase pressure of an already inadequate supply to meet the ever increasing level of demand.

There is another major structural flaw in the Scoping Plan. Generally speaking, emission source sectors are assigned responsibility for internalizing the cost of reduction measures, thus squandering the opportunity to make the most efficient use of scarce resources by prioritizing relatively efficient, low-cost reduction measures for early implementation while longer acting and more costly strategies are developed and refined. One example is the potential to achieve significant reductions from increasing the energy efficiency of the existing built environment. Many existing structures were built well before the implementation of energy code Title 12 efficiency standards. The reductions possible from insulating and replacing windows and outmoded heating and cooling units (about \$12,000) could be achieved at a much lower unit cost than would be achieved from pushing relatively efficient new construction to Tier II with photovoltaic standards (approximately \$25,000) Shouldn't the Scoping Plan prioritize the most cost-effective means of rapid reduction, while phasing in the costlier, less efficient and more complex reduction measures over a longer time frame?

However, the Scoping Plan places retrofitting the built environment for higher efficiency in the GhG reduction budget of the utilities sector. Segregating sector budgets divides natural synchronicity that could occur if all elements of the built environment were factored together. Homebuilders have the skills and the means to retrofit the built environment, but if that is not linked with their efforts in new development, an opportunity is lost. If carbon credits could be aggregated and sold across sectors to help provide a revenue stream to fund the more efficient, least-cost solutions without further price pressure on the housing sector many social policy goals could be served. The additional unit cost of Tier II with photovoltaic standards for new home construction could be in part absorbed with carbon credit revenues, not government or utility rebates that are funded by the taxpayer or rate-paying consumer.

More compact development and integration of uses to reduce VMT will only accomplish so much without a huge public investment in transit. New development cannot alone bear the cost, without again dampening the level of development for which consumers can afford to pay. Local and state governments do not have the means to make this investment without significant changes in California's Constitutional restrictions on public finance. (Props 13 and 218).

The San Joaquin Air Quality Enforcement District's experiment with the Indirect Source Rule amounts to a "sprawl tax" to discourage

less efficient, more auto-centric development projects. What it is missing is the dedication of the fee revenues to improvements in transit systems and other public improvements that are the essential other half of the equation for the full promise of decreased auto-dependency to be realized. It is also a form of regulation of the design of development that would more appropriately be exercised by counties' and cities' planning and building departments, where it can be integrated with the planning of the supportive infrastructure more compact development requires. The last thing builders and homebuyers need is another regulatory counter to cross and set of fees to pay in California's incoherent land use regulatory regime.

Big changes that require establishment of new laws and many complex and interactive factors need time, better sources and more careful evaluation of the data which justify them. It is important to begin the process, but not to assume we can fully understand and can provide for all inter-dependencies and contingencies that may be required.

Regional transportation and land use targets for GhG reduction need to be based on broad public support and suited for the particular challenges and opportunities of each region. The biggest GhG reduction challenge is after 2020, which likely will require about a 30% cut in per capita GhG. If the population increases forecast prove accurate, Californian's per capita GhG emission rate must be cut by 90% of the 2004 rate by 2050, to 1.4 metric tons per person per year, which is about what the average citizen of Columbia, South America, emits. There is time and unmet need enough to set transportation and land use targets for 2035 and beyond, rather than precipitously set targets that preempt the process the legislature mandated be followed in SB 375.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-02 16:49:47

No Duplicates.

## **Comment 247 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Erica

Last Name: Etelson

Email Address: ericaetelson@hotmail.com

Affiliation:

Subject: Comments on AB 32 Plan

Comment:

I would like to echo the comments submitted by Bay Localize regarding the AB32 scoping plan. In addition, I'd like to emphasize the need for stronger focus on agriculture and food transportation. As the nation's bread basket, the ag sector in California is one of the largest emitters of GHGs in the world. Reducing and, ultimately, eliminating our use of chemical pesticides and fertilizers will go a long way toward reducing our GHG emissions as well as improving air quality and sparing our water bodies an enormous amount of pollution.

At the same time, California must be a leader in the local food movement--we need a statewide plan that carves the state into growing/consuming regions in which food is produced for local/regional consumption, thereby minimizing the number of food miles traveled.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 09:18:14

No Duplicates.



**Comment 248 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tony  
Last Name: Winney  
Email Address: twinney@ci.poway.ca.us  
Affiliation: Local Government

Subject: City of Poway Comment Letter Re: ARB Scoping Plan  
Comment:

Dear Chair Nichols:

On behalf of the City of Poway, thank you for the opportunity to comment on the California Air Resource Board's (ARB) Scoping Plan. Our comments are summarized in the attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/894-ab\\_32\\_carb\\_scoping\\_plan\\_response\\_12-01-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/894-ab_32_carb_scoping_plan_response_12-01-08.pdf)

Original File Name: AB 32 CARB Scoping Plan Response 12-01-08.pdf

Date and Time Comment Was Submitted: 2008-12-03 09:19:38

No Duplicates.

## **Comment 249 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Carolyn Sherwood  
Last Name: Call  
Email Address: carolynsc@sbcglobal.net  
Affiliation:

Subject: GHG reductions from high-speed rail  
Comment:

Thank you for the opportunity to comment on the Proposed Scoping Plan. I have analyzed CARB's GHG calculations for high-speed rail and have found that CARB's estimate understates the impact of high-speed rail on GHG emissions. I estimate that high-speed rail will reduce CO<sub>2</sub>E by 2.5 MMT in 2020, more than twice CARB's estimate of 1.1 MMT CO<sub>2</sub>E.

Two factors drive most of the difference between CARB's estimate and mine:

\* CARB's ridership estimate is based on a gasoline price in 2020 of \$2.74 per gallon. If the price of gasoline is closer to \$4 per gallon in 2020, more travelers will choose high-speed rail over air or auto travel, reducing CO<sub>2</sub>E by an additional 0.8 MMT in 2020.

\* CARB's carbon factor for air travel is lower than most analysts use. Changing the parameter for air travel generates a further cut in emissions of 0.5 MMT CO<sub>2</sub>E.

Details of the analysis are included in the attached report.

-Carolyn Sherwood Call, Ph.D.

Attachment: [www.arb.ca.gov/lists/scopingpln08/895-ghg\\_analysis\\_of\\_high-speed\\_rail.pdf](http://www.arb.ca.gov/lists/scopingpln08/895-ghg_analysis_of_high-speed_rail.pdf)

Original File Name: GHG Analysis of High-Speed Rail.pdf

Date and Time Comment Was Submitted: 2008-12-03 09:52:13

No Duplicates.

## **Comment 250 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Andrew

Last Name: Henderson

Email Address: ahenderson@biasc.org

Affiliation: Building Industry Association of S.C.

Subject: Targeted GHG Reduction from Regional Transportation

Comment:

Concerning the pending Scoping Plan for A.B. 32, I write to express strong concern about the recommendation to target a reduction of 5 million metric tons annually of greenhouse gases from regional transportation and land use. Specifically, I understand that the Board and its staff are being asked by some camps to increase the recommended target for reductions from regional transportation even higher still, above 5 million metric tons.

I strongly urge the Board NOT to increase the reduction target for regional transportation any further. First, I am unaware of any evidence that would indicate that even larger reductions are reasonably achievable and would not cause wrenching dislocations and extreme economic hardship. Moreover, local governments, county transportation commissions and transportation planning agencies, and countless stakeholders are already faced with implementing the recently-enacted Senate Bill 375, which sets forth a challenging process to spur changes to transportation and land use planning in order to achieve A.B. 32 compliance. Even bigger reduction targets for regional transportation in the scoping plan - above the 5 million metric tons annually proposed - would lead to chaos if they were to be translated, in any way, into S.B. 375 regional reduction targets.

Accordingly, I respectfully urge the Board not to increase any more the recommended, targeted reduction of greenhouse gases from regional transportation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 10:37:07

385 Duplicates.

## **Comment 251 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Graham

Last Name: Brownstein

Email Address: [execdirector@ecosacramento.net](mailto:execdirector@ecosacramento.net)

Affiliation: ECOS - Environmental Council of Sac.

Subject: Increase Targeted GHG Emissions Reductions from "Smart Growth"

Comment:

The Environmental Council of Sacramento (ECOS) applauds California's efforts to reduce greenhouse gas (GHG) emissions. However, we remain extremely concerned that the AB 32 Scoping Plan in its current iteration fails to outline a sufficiently aggressive target for reducing GHG emissions via "smart growth" related changes in transportation and land use planning. ECOS feels strongly that the CA Air Resources Board (CARB) must increase the goal for GHG emissions reductions achieved via smart growth land use and transportation planning from the current proposed 5 Million Mega Tons (MMT) to somewhere in the range of 11-14 MMT per year.

A target of 11-14 MMT is achievable and would translate to a very modest reduction in driving by the year 2020 of less than four miles per day per licensed driver. If CARB sets a lower target (e.g., something in the range of 5 MMT), the result will be greatly expanded "greenfield" development and more road and highway expansions and new construction. This kind of business-as-usual approach to planning will make it impossible to reach the 2050 targets established by AB 32. For California to achieve the critical goals of AB 32, we must see reductions in vehicle miles traveled (VMT) of approximately 10% by 2020 and 20% by 2030. The current 5 MMT target equates to a 4% VMT reduction by 2020, less than half of what is needed.

In addition to setting a more aggressive target for GHG reductions, CARB should highlight the importance of prioritizing new and expanded funding for pedestrian, bike, and transit facilities. Getting Californians out of our cars will require a paradigm shift in transportation options and behaviors. This means "complete streets" throughout our urbanized areas and greatly expanded funding for transit operations and maintenance. The Scoping Plan needs to emphasize these priorities so that local governments will appropriately update and modify their plans and impose necessary requirements on new projects.

Finally, the Scoping Plan needs to address equity, environmental justice and public health. CARB should ensure that AB 32 implementation includes goals for improving public health and enhancing the equity of our metropolitan areas through smarter coordinated transportation and land use planning. Again, a clear signal from CARB will help spur local governments to better address these issues through local planning documents and project funding allocations.

Thank you for your attention. Please do not hesitate to contact us with any questions.

Sincerely,  
Graham Brownstein  
Executive Director, ECOS

Attachment: [www.arb.ca.gov/lists/scopingpln08/898-letter.carb.ab32.scopingplan.12.3.08.pdf](http://www.arb.ca.gov/lists/scopingpln08/898-letter.carb.ab32.scopingplan.12.3.08.pdf)

Original File Name: Letter.CARB.AB32.ScopingPlan.12.3.08.pdf

Date and Time Comment Was Submitted: 2008-12-03 11:09:20

No Duplicates.

## **Comment 252 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Louise  
Last Name: Hudgens  
Email Address: lhudgens@cityoftaft.org  
Affiliation: City Clerk, City of Taft

Subject: Comments on CARB Proposed Scoping Plan  
Comment:

December 2, 2008

Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95814

RE: City of Taft Comments on California Air Resources Board  
Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the City of Taft, thank you for the opportunity to comment on the California Air Resources Board's (CARB) proposed Scoping Plan.

We are proud of the work we have done already on reducing our City's greenhouse gas (GHG) emissions. In August 2008, the City enrolled all of its accounts into the Pacific Gas and Electric (PG&E) ClimateSmart Program. The ClimateSmart Program is a new voluntary option from PG&E that enables local governments and community residents and businesses to take action against climate change by reducing the GHG emissions associated with their energy use. Funds generated by the ClimateSmart Program will be invested in new California-based GHG emissions reduction programs.

The City is making an effort to make the public aware of the things they can do to reduce GHG emissions and recycle. The City published an article in the local newspapers entitled "10 things you can do to combat Global Warming". The article informed the public of the everyday things they can do to reduce greenhouse gases and improve air quality. Also, the City put together a detailed list of all the recycling centers in the area and published it in the local newspapers.

The City also worked with PG&E to make its facilities energy efficient in order to conserve energy and reduce costs. The City will further encourage and implement programs to do its part in reducing GHG emissions and improving the air quality in the Southern San Joaquin Valley Air Basin.

While the City of Taft is generally supportive of a number of

programs and policies outlined in the Scoping Plan, it is crucial State policymakers take account for the means that will be needed to achieve the goals of reducing GHG. California Health & Safety Code (HSC) §38560 requires California Air Resources Board (CARB) to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. HSC §38562 (b)(5) states that CARB shall consider the cost-effectiveness of these regulations.

In addition, the City is supportive of the model proposed in the Scoping Plan that recognizes that regional transportation related to GHG targets will be set by the process outlined in Senate Bill (SB) 375. Although, CARB should retain the 5 million metric tons (MMT) figure for regional transportation-related GHG targets in the Scoping Plan and let the regional target process set out in SB 375 operate as it was intended. The City will work with its regional transportation agency to comply with SB 375.

As State and local governments deal with critical budget shortages and deficits, additional costs to invest in the reduction of GHG emission technologies in the next 2 to 3 years may become more of a financial burden for local governments. Local governments can influence and change development design standards, but the reality is that developers will only develop projects that will be appealing to customers in order to stay in business. In order to effect the desired change, incentives must be provided to the development community and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The City of Taft strongly encourages that CARB consider these limitations as it moves forward with the Scoping Plan.

Thank you again for the opportunity to comment on the Scoping Plan.

Sincerely,

Dave Noerr  
Mayor

c: League of California Cities, 1400 K Street, Ste. 400,  
Sacramento, CA 95814  
Robert T. Gorson, Jr., Taft City Manager  
Ronald E. Brummett, Executive Director, 1401 19th Street, Suite  
300, Bakersfield, CA 93301  
Taft City Council Members

Attachment: [www.arb.ca.gov/lists/scopingpln08/900-carb\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/900-carb_scoping_plan.pdf)

Original File Name: CARB scoping plan.pdf

Date and Time Comment Was Submitted: 2008-12-03 14:08:07

No Duplicates.

**Comment 253 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: dennis

Last Name: haskins

Email Address: dhaskins@desilvagates.com

Affiliation:

Subject: AB 32

Comment:

Please do not increase the limits during this critical economic time. Enough is enough for awhile. Vote against AB 32.

Thank you,  
Dennis Haskins

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 16:59:31

No Duplicates.



**Comment 254 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Matt

Last Name: Vander Sluis

Email Address: mvander@pcl.org

Affiliation: Planning and Conservation League

Subject: Comments on Land Use, Auction, Public Health

Comment:

Thank you for your attention to these comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/951-pcl\\_comments\\_on\\_ab\\_32\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/951-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 17:25:58

No Duplicates.

## **Comment 255 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom  
Last Name: O'Malley  
Email Address: tomalley@atascadero.org  
Affiliation: Council Member, City of Atascadero

Subject: Comments on ARB Proposed Scoping Plan  
Comment:

December 3, 2008

Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95814

RE: City of Atascadero Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

Thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan). I attended the November 20th hearing in Sacramento. Unfortunately, due to commitments at home I was unable to stay late enough to get an opportunity to testify.

We are proud of the work we have already done on reducing our City's greenhouse gas emissions (GHG emissions). I am proud that when I was Atascadero's mayor, I led our City to sign in support of the US Mayors Climate Protection Agreement, and I served as Chairperson of San Luis Obispo County's Air Pollution Control District Board. Also, as former Chairperson of San Luis Obispo County's Economic Vitality Corporation Board, it is very important to me to achieve a balance between protecting our environment and our local economy. Our City has worked to: preserve a greenbelt around Atascadero, encourage mixed use infill development, encourage compact development with a pedestrian scale and trails, replace all existing lighting fixtures with energy efficient lighting, install a new energy efficient "Green Roof" on City Hall and much more.

I am especially concerned that the State actions you are considering could stifle the entrepreneurial spirit which exists in communities such as ours. California is replete with examples where top-down regulation has not produced results, but has increased costs. We are on the verge, if not in the middle of, one of the largest financial crises faced by our State. Please carefully consider the economic impacts on local jurisdictions as you adopt rules to implement AB 32. Your actions will be critical to our State's success.

While the City of Atascadero is generally supportive of a number

of programs and policies outlined in the Scoping Plan, it is crucial for State policymakers to take into account the means that will be needed to achieve the goals. AB 32 requires that reductions in GHG emissions must achieve the maximum technologically feasible, make cost effective reductions and that the ARB "consider the cost-effectiveness of these regulations." (HSC §38560) In addition, we believe that the Scoping Plan appropriately allows the SB 375 process to develop regional transportation-related GHG targets. Implementation of the regional planning processes in SB 375 is new and largely untested. The 5 MMT figure, while a place holder, nevertheless sets an appropriate benchmark that helps assure that the state can achieve its overall 2020 goal."

As both the State and local governments are faced with critical budget shortages, additional costs to heavily invest in GHG emission technologies in the next two to three years will become more burdensome for local governments. While local governments can influence development design to a certain extent, the reality is that developers only will build projects that will be purchased by willing customers and that are profitable. In order to effect the desired change, incentives must be provided to the development community and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The City of Atascadero strongly encourages the ARB to consider these limitations as it moves forward with the Scoping Plan

Thank you again for the opportunity to comment.

Sincerely,

Tom O'Malley  
Council Member  
City of Atascadero

xc: League of California Cities, 1400 K Street, Sacramento, CA  
95864

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 17:59:04

No Duplicates.

## **Comment 256 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: YVETTE

Last Name: ROBBINS

Email Address: ILLUSIONSBYISUE@SBCGLOBAL.NET

Affiliation:

Subject: Stop AB32

Comment:

Please do not pass this bill. The burden should not fall right now as it has not been proven. Along with this the environmentalists are driving our economy to doom in a time that we need to work on building it up. These unfair costs should be scrutinized fully before they are put to a bill. We as taxpayers need to speak up more. We are now in a water shortage due to the protection of a tiny fish. We have to decide once and for all whether people's needs and costs actually count or do we let the environmentalists just packing on things to stop growth.  
thank you,  
Yvette Robbins

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 18:18:22

No Duplicates.

**Comment 257 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dee

Last Name: Snow

Email Address: dsnow@snow-properties.com

Affiliation:

Subject: Air Quality -AB 32

Comment:

I strongly urge you not to increase the Regional Transportation-Related Targets any further. I work in this industry daily and we are on our knees. Please do not add unnecessary restrictions and obligations that are not scientifically defensible. My company has sponsored seminars put on by the Local Agency Commission on behalf of the State of California. We make it a practice to be well informed and involved. Thank you, Dee Snow, General Contractor and Developer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-03 19:40:05

No Duplicates.

**Comment 258 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Judith

Last Name: Bell

Email Address: jbell@policylink.org

Affiliation: PolicyLink

Subject: PolicyLink Comments on Proposed AB32 Scoping Plan

Comment:

Summary of attached letter:

In order to meet the law's ambitious environmental, public health and economic goals we urge you to strengthen and adopt the proposed regulatory program, eliminate the proposed trading program and develop a more comprehensive, accurate and useful public health assessment.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1023-policylink\\_ab\\_32\\_comments\\_final.doc](http://www.arb.ca.gov/lists/scopingpln08/1023-policylink_ab_32_comments_final.doc)

Original File Name: PolicyLink AB 32 Comments Final.doc

Date and Time Comment Was Submitted: 2008-12-04 08:26:41

No Duplicates.

**Comment 259 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mike

Last Name: Lane

Email Address: Mikela@laneengineers.com

Affiliation:

Subject: AB 32

Comment:

AB 32 needs to be reviewed and analyzed from the cost/benefit perspective. The last thing the State of California needs is another economic disincentive.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 08:47:01

No Duplicates.

**Comment 260 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stan

Last Name: Dixon

Email Address: Non-web submitted comment

Affiliation:

Subject: Board of Forestry and Fire Protection

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1063-01.pdf](http://www.arb.ca.gov/lists/scopingpln08/1063-01.pdf)

Original File Name: 01.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:34:48

No Duplicates.



**Comment 261 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Frank

Last Name: Scotto

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Torrence

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1064-02.pdf](http://www.arb.ca.gov/lists/scopingpln08/1064-02.pdf)

Original File Name: 02.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:35:43

No Duplicates.

**Comment 262 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Stufflebean

Email Address: Non-web submitted comment

Affiliation:

Subject: City of San Jose

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1065-03.pdf](http://www.arb.ca.gov/lists/scopingpln08/1065-03.pdf)

Original File Name: 03.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:36:22

No Duplicates.

**Comment 263 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Blair

Last Name: King

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Lodi

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1066-04.pdf](http://www.arb.ca.gov/lists/scopingpln08/1066-04.pdf)

Original File Name: 04.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:37:01

No Duplicates.

**Comment 264 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ronald

Last Name: Brummet

Email Address: Non-web submitted comment

Affiliation:

Subject: Kern Council of Governments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1067-05.pdf](http://www.arb.ca.gov/lists/scopingpln08/1067-05.pdf)

Original File Name: 05.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:37:48

No Duplicates.

**Comment 265 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Chris

Last Name: Jeffers

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Glendora

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1068-06.pdf](http://www.arb.ca.gov/lists/scopingpln08/1068-06.pdf)

Original File Name: 06.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:39:23

No Duplicates.

**Comment 266 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: James

Last Name: McCann

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Calistoga

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1070-07.pdf](http://www.arb.ca.gov/lists/scopingpln08/1070-07.pdf)

Original File Name: 07.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:41:29

No Duplicates.

**Comment 267 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Barry

Last Name: Brucker

Email Address: Non-web submitted comment

Affiliation:

Subject: Beverly Hills

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1071-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1071-08.pdf)

Original File Name: 08.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:42:04

No Duplicates.

**Comment 268 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Matthew

Last Name: Hargrove

Email Address: Non-web submitted comment

Affiliation:

Subject: California Business Properties Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1076-10.pdf](http://www.arb.ca.gov/lists/scopingpln08/1076-10.pdf)

Original File Name: 10.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:44:22

No Duplicates.



**Comment 269 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Adela

Last Name: Gonzalez

Email Address: Non-web submitted comment

Affiliation:

Subject: Soledad

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1077-09.pdf](http://www.arb.ca.gov/lists/scopingpln08/1077-09.pdf)

Original File Name: 09.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:45:10

No Duplicates.

**Comment 270 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Vickie

Last Name: Talley

Email Address: Non-web submitted comment

Affiliation:

Subject: NAIOP- National Association of Industrial and Office Properties

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1080-11.pdf](http://www.arb.ca.gov/lists/scopingpln08/1080-11.pdf)

Original File Name: 11.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:46:27

No Duplicates.

**Comment 271 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gavin

Last Name: Newsom

Email Address: Non-web submitted comment

Affiliation:

Subject: Office of Mayor- Gavin Newsom

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1083-14.pdf](http://www.arb.ca.gov/lists/scopingpln08/1083-14.pdf)

Original File Name: 14.pdf

Date and Time Comment Was Submitted: 2008-12-04 09:52:22

No Duplicates.

## Comment 272 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: The

Last Name: Pacific Forest Trust

Email Address: achiono@pacificforest.org

Affiliation:

Subject: Proposed Scoping Plan Language Recommendation

Comment:

Dear Board Members Loveridge and Riordan,

Thank you very much for our discussion today. As promised, here is some proposed language that embodies what we discussed, and that PFT would like to see added to the Scoping Plan, either in its text, or in the Resolution for Adoption.

1. Cross Sectoral Accounting: in the Adopting Resolution, we suggest adding " The Board directs the staff to ensure that transparent, cross-sectoral accounting systems be developed such that stocks and flows of carbon can be tracked readily within and across sectors, as, for example, from forests to landfills to methane emissions"
2. Accounting for Adaptive Management: in the adopting resolution we suggest adding: " The Board directs staff to ensure that accounting across all sectors provides data sufficient to identify significant changes in carbon stocks and flows at the source of such change, in order to allow for adaptive management to ensure the achievement of AB 32 target goals."
3. Synergy of Mitigation and Adaptation: we suggest adding in the text of the forest sector "Actions undertaken pursuant to AB 32 for purposes of mitigation in the Forest Sector are inherently linked to those appropriate for adaptation to support resilient, robust natural forest ecosystems that are more capable of adapting to climate change, especially with regard to watershed and habitat functions. Therefore, ARB will consult with key state entities responsible for the health and functioning of watersheds and habitat for California's plants, fish and wildlife to ensure actions pursuant to AB 32 are also beneficial for adaptation."
4. Woody biomass combustion: We note that the addenda have changed the definition of woody biomass combustion from anthropogenic to biogenic. ARB should classify woody biomass combustion as an anthropogenic emission. The combustion of biomass vastly speeds up the release of carbon from waste-wood and from slash after harvest. Because there is insufficient waste and slash material available to meet biomass demands, this will result in increased harvest to fulfill that demand, overall emissions from biomass combustion will increase, as will forest -based emissions resultant from increased harvest disturbance. Unless harvest rotations or intervals are held steady, there will be insufficient times to re-absorb those emissions in the forest. This is likely to result in net increased emissions overall.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 13:30:03

No Duplicates.

**Comment 273 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ben  
Last Name: Etemadi  
Email Address: betemadi@hunsaker.com  
Affiliation: Civil Engineer

Subject: CARB Action on Dec. 11, 2008  
Comment:

To whom this may concern:

As you know the housing industry is facing the biggest challenge it has ever faced with regards to affordability and the increase in construction cost (as of 2005-2007) and now the drop of real estate value. Added Restriction such as AB32 will kill any possibility of recovery for our industry and push folks like i out of the country for employment with minimum chance of return.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 13:31:35

No Duplicates.

## **Comment 274 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Matt

Last Name: Adams

Email Address: adams6472@cox.net

Affiliation:

Subject: Reject Proposed AB 32 Scoping Plan

Comment:

I live in San Diego and I am very concerned concern about the draft recommendation within the AB 32 Scoping plan to target a reduction of 5 million metric tons (MMT) annually of greenhouse gases from Regional Transportation-Related Targets. Specifically, I understand that the Board is being asked by some to increase that target to something higher, potentially significantly higher, than 5 million metric tons.

I strongly urge the Board NOT to increase the Regional Transportation-Related Targets any further. Additional burdens will make it even harder for the housing market to come back from the throngs of depression. The Federal REserve Chairman, Ben Bernanke, says restoring the housing market is the key to reviving the economy.

I not only question whether sufficient scientific information exists to support quantifying greenhouse gas (GHG) reductions from passenger vehicles at the proposed 5 MMT level, but I also know of no credible scientific evidence that would indicate that larger reductions are reasonably achievable or sustainable without causing dislocations and extreme economic hardships.

Governor Schwarzenegger recently signed Senate Bill 375, which sets out the process to determine the actual Regional Transportation-Related GHG Targets. That process needs to be given deference and allowed to work. It should not be preempted at this early stage by unilateral action by the Board!

As someone who lives in California and is concerned about GHG emmissions, I have a vested interest in the success of SB 375 and AB 32. I also have a vested interest in helping the state out of its current and profound economic malaise. Imposing out-of-proportion burdens on new housing will neither help our struggling economy nor realistically achieve our AB 32 goals.

I strongly urge you not to increase the Regional Transportation-Related Targets any further.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 14:09:46

No Duplicates.



**Comment 275 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Roger

Last Name: Ziemer

Email Address: springer303@verizon.net

Affiliation:

Subject: CARB Initiative w/ BIA/SC

Comment:

No action on this issue should be take without proof that proposed measures will work and are cost effective.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 14:18:44

No Duplicates.

**Comment 276 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ted

Last Name: Smalley

Email Address: ldawson@fresnocog.org

Affiliation:

Subject: SJV Regional Planning Agencies' Directors' Comments

Comment:

The attached letter is submitted on behalf of the San Joaquin Valley Regional Planning Agencies' Directors' Committee. The Committee represents the eight MPOs of the San Joaquin Valley: San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare and Kern Counties.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1171-signed\\_rpa\\_directors\\_comment\\_letter\\_ab32\\_psp\\_12-4-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1171-signed_rpa_directors_comment_letter_ab32_psp_12-4-08.pdf)

Original File Name: Signed RPA Directors Comment Letter AB32 PSP 12-4-08.PDF

Date and Time Comment Was Submitted: 2008-12-04 15:42:41

No Duplicates.

**Comment 277 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Margaret

Last Name: Clark

Email Address: Non-web submitted comment

Affiliation:

Subject: Los Angeles County- Solid Waste Management Committee

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1178-task\\_force\\_ab\\_32\\_proposed\\_scoping\\_plan\\_\\_3\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/1178-task_force_ab_32_proposed_scoping_plan__3_.pdf)

Original File Name: Task Force\_AB 32 Proposed Scoping Plan (3).pdf

Date and Time Comment Was Submitted: 2008-12-04 16:18:06

No Duplicates.

**Comment 278 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dorothy

Last Name: Rothrock

Email Address: Non-web submitted comment

Affiliation:

Subject: AB 32 Implementation Group

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1179-carb\\_lao\\_memo\\_\\_3\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/1179-carb_lao_memo__3_.pdf)

Original File Name: CARB LAO Memo (3).pdf

Date and Time Comment Was Submitted: 2008-12-04 16:19:02

No Duplicates.

**Comment 279 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Huey

Last Name: Johnson

Email Address: Non-web submitted comment

Affiliation:

Subject: Resources Renewal Institute

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1180-fookesab32report.zip](http://www.arb.ca.gov/lists/scopingpln08/1180-fookesab32report.zip)

Original File Name: FookesAB32Report.zip

Date and Time Comment Was Submitted: 2008-12-04 16:20:43

No Duplicates.

**Comment 280 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Roger

Last Name: Niello

Email Address: [assemblymember.niello@assembly.ca.gov](mailto:assemblymember.niello@assembly.ca.gov)

Affiliation: Member, California State Assembly

Subject: Letter of request for delay in Scoping Plan adoption and answers to LAO and peer review

Comment:

Attached please a copy of a letter delivered to ARB Chairwoman Mary Nichols regarding a request for delay in the adoption of the AB 32 Scoping Plan and a response to the questions and issues outstanding in the recently released LAO and Peer Review analysis of the Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1181-nichols\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/1181-nichols_letter.pdf)

Original File Name: Nichols Letter.pdf

Date and Time Comment Was Submitted: 2008-12-04 16:21:49

No Duplicates.

## **Comment 281 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stan

Last Name: McClain

Email Address: stan@filmtools.com

Affiliation: IATSE and NFIB

Subject: Support of AB 32 Scoping Plan

Comment:

As a small business owner (member INC Magazine's top 5000 fastest growing private companies in America) and a member of 3 unions (IATSE Local 600, DGA, SAG) I sometimes have opinions that conflict with my interests, and when I do, I try to lean what is right for the American Public and small business.

NFIB would like to see me support their view, but this time, I feel that the much bigger picture is at stake, and I may have to pitch in to help matters. I may have to swap out heating and air conditioning units, install Solar panels, completely swap out the light fixtures in my 18,000 square foot building for the newer energy efficient electric ballast fluorescent lighting.

All of the small business have an obligation to help out... and if labor unions are charging too much for their services as they relate to supporting the energy program, then they too need to help by lowering wages.

There is no such thing as a free lunch and lunch is being served now!

Stan McClain,  
President  
Filmtools, Inc  
Lindcraft, Inc  
SKC Working Dream Inc.

Member: Local 600, DGA, SAG, NFIB

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 18:56:13

No Duplicates.

## **Comment 282 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Boesel

Email Address: jboesel@calstart.org

Affiliation: CALSTART

Subject: CALSTART comments on proposed plan

Comment:

CALSTART appreciates the opportunity to comment on the proposed Scoping Plan. Please see attached comments recommending: (1) timely and effective implementation, (2) auctioning of allowances, (3) strategic investment of auction revenues and other public funds in transportation, (4) including transportation fuels in the cap and trade program at the outset, and (5) providing stronger land use and smart growth targets.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1192-calstart\\_comments\\_on\\_proposed\\_scoping\\_plan\\_12-4-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1192-calstart_comments_on_proposed_scoping_plan_12-4-08.pdf)

Original File Name: CALSTART comments on proposed scoping plan 12-4-08.pdf

Date and Time Comment Was Submitted: 2008-12-04 20:35:29

No Duplicates.



## **Comment 283 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kevin

Last Name: Ward

Email Address: krw10.4@gmail.com

Affiliation:

Subject: Target Existing Commercial Buildings First!

Comment:

Dear Whoever Thinks They Are Saving the Planet,

Do your homework immediately. New residential construction isn't perfect, some of the water run off is slightly dirty (just like the run off from your neighbor down the street who just washed his car), some of the materials used in the homes may still be unhealthy (but believe me, they're working on that too) and some of the lumber used may not be from sustainable forestry (however you'd be quite shocked to find out how much actually is),

but good lord have you not looked around your city, your county, or your entire state to see how skyscrapers and other large commercial buildings are sucking the life out of our resources!

Water, electricity and indoor environmental air quality are just some of the more obvious issues screaming to be addressed in these warehouses of waste.

Environmentalists are concerned with saving the earth so that more people, more generations of human kind can enjoy their great gift of life on a clean, healthy support system for that life. That's an outstanding mission, who can argue against that? But what about the people who are alive right now! Help the office workers breathe cleaner indoor air and simultaneously help the environment by addressing the real construction related issue: EXISTING COMMERCIAL BUILDINGS! And for the love of Pete and his long list of relatives' sake, stop picking on homebuilders! They aren't your biggest concern!

If you run the numbers, you will see that solving the problems of large commercial properties is priority number one next to somehow grappling with the 800 pound gorillas that go by the name of transportation and coal burning energy plants. It's merely a matter of being focused on net results, not easy prey such as new home builders who have recently "put themselves out there" and thus made themselves a more convenient target for supposed environmentalists.

Someone you know works for John Laing or Shea or William Lyon or some other homebuilder that started as nothing more than a family with a dream to make a living building homes. And now, decades later, after building a legacy of excellent products within the guidelines and often above the guidelines of public policy, they are being constantly subjected to libel, slander, abusive and malicious lawsuits and all the while their teams are completely focused on innovative solutions to the challenges of taking from

the earth to build our undeniable need for shelter and doing so in such away that allows them to buy a shelter of their own. So please see that person you know as a good person and redirect your energies to making a quantifiably larger impact on the environment with your efforts and aim your passion at commercial properties. Get serious about making a difference now, the homebuilders are already getting it 90 to 99% right. Move on to the major commercial property owners who are probably doing next to nothing...

Sincerely,

Kevin Ralph Ward,  
Aspiring Sustainability Manager. (And just a plain old dude who thinks homebuilders are cool people who society is asking to fund the solutions for so many problems they never created in the first place)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-04 22:03:35

No Duplicates.

## **Comment 284 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jake

Last Name: Mackenzie

Email Address: blumacjazz@aol.com

Affiliation: Mayor ,City of Rohnert Park

Subject: Comment from Progressive members of the LCC's Environmental Quality Committee  
Comment:

Dear Members of the Board,

We are communicating with you in our role as progressive members of the League of CA Cities Environmental Quality Committee.

We believe that the economic and environmental challenges faced by our cities today call for bold and innovative leadership. While some of our cities are hesitant to address the new challenges poised by climate change, many others feel compelled to take action in their communities. Those of us on the front lines are very much in need of assistance and support from the State.

We request that CARB increase the share of greenhouse gas reductions allocated to regional governments from 5 to 11 to 14 MMT. This request is based on a recent scientific analysis by Dr. Reid Ewing and Dr. Arthur C. Nelson which shows that these reductions are achievable with policies California is already contemplating.

By setting a higher target, CARB can signal that the land use/transportation sector is a priority. The higher target will ensure that regional agencies, cities and counties will aim high in their efforts to reduce greenhouse gases from vehicle emissions. Coupled with the essential financial resources, technical assistance and other support from federal, state and private resources, these local governments will be positioned for success and continued leadership in this global fight against climate change. On the other hand, a low target below what scientific analysis shows can be achieved, will send the opposite signal, indicating that land use/transportation is not a priority and will not receive a commensurate share of resources.

While we feel that every local government should address the dire circumstances we are facing today, we are not asking that you support a mandate for local governments to act. SB 375 very clearly exempts our cities and counties from any regulatory requirements.

As Chair of the League of California Cities' Environmental Quality Committee, Vice Chair of the Local Government Commission, and a leader in addressing climate change in my region, I have been asked to participate in the 14th International United Nations Climate Change Conference. I hope to be able to report that our cities are being asked to continue playing a key role in our State's climate change policy efforts.

As you know, the world is watching California and its local governments: expecting us to provide inspiration and a model for others to follow. This is an opportunity and a responsibility of monumental importance. Please help us by assigning local and regional Governments a significant role in achieving the goals of AB 32. My colleagues and I will not let you down.

Respectfully yours,

Jake Mackenzie, Mayor, City of Rohnert Park  
Jean Quan, President Pro-tem, City of Oakland  
Jon Harrison, Mayor, City of Redlands  
Maggie Houlihan, Councilmember, City of Encinitas  
Tom Butt, Councilmember, City of Richmond

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 06:44:21

No Duplicates.

**Comment 285 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Marc

Last Name: Stolman

Email Address: MDStolman@aol.com

Affiliation: E2

Subject: Support - Including Feebates in Scoping Plan

Comment:

I support the inclusion of a feebate program in the AB 32 scoping plan. This will be good for the state's economy, as well as its environment.

Marc Stolman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 09:09:12

No Duplicates.

**Comment 286 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kate  
Last Name: Miller  
Email Address: kmiller@actransit.org  
Affiliation:

Subject: AB 32 Climate Change Scoping Plan  
Comment:

Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1218-ab32\\_climate\\_change\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1218-ab32_climate_change_scoping_plan.pdf)

Original File Name: AB32 Climate Change Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-05 11:41:47

No Duplicates.

**Comment 287 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Therese

Last Name: McMillan

Email Address: TMcMillan@mtc.ca.gov

Affiliation:

Subject: Metropolitan Transportation Commission comments on Proposed Scoping plan  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1219-1-nov20-2008ab32\\_comment\\_lettertd.doc](http://www.arb.ca.gov/lists/scopingpln08/1219-1-nov20-2008ab32_comment_lettertd.doc)

Original File Name: L-Nov20-2008AB32 comment letterTD.doc

Date and Time Comment Was Submitted: 2008-12-05 11:44:38

No Duplicates.

**Comment 288 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gregg

Last Name: Morris

Email Address: gmorris@emf.net

Affiliation: Green Power Institute

Subject: Joint Comments of GPI and CBEA

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1224-gpi\\_comments\\_on\\_proposed\\_scoping\\_plan\\_12-5-8.pdf](http://www.arb.ca.gov/lists/scopingpln08/1224-gpi_comments_on_proposed_scoping_plan_12-5-8.pdf)

Original File Name: GPI comments on proposed scoping plan 12-5-8.pdf

Date and Time Comment Was Submitted: 2008-12-05 12:42:22

No Duplicates.



**Comment 289 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Evelyn

Last Name: Kahl

Email Address: ek@a-klaw.com

Affiliation: EPUC and CAC

Subject: EPUC & CAC Comments on Proposed Scoping Plan

Comment:

Attached are the comments of EPUC and CAC on the proposed scoping plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1225-epuc.cac\\_comments\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1225-epuc.cac_comments_scoping_plan.pdf)

Original File Name: EPUC.CAC Comments Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-05 12:59:25

No Duplicates.

## **Comment 290 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ray

Last Name: Harrod

Email Address: Rayharrod@redshift. Com

Affiliation: Harrod Brothers Inc

Subject: AB32 Scoping Plan To Reduce Greenhouse Gas

Comment:

We do not need such a bill at this time , We have already had to lay off our entire construction crews . In my opinion this whole green movement is out of control. It's designed to create agency such as leed and try and get it so all builders will have to submit plans to them for review to get their certification and of course they will have to establish a fee to keep their agency going just another bureaucracy in the making. The same goal can be achieved in a much simpler way.  
Sincerely, Ray Harrod

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 13:14:42

No Duplicates.

## **Comment 291 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mara  
Last Name: Burstein  
Email Address: mburstein@environmentnow.org  
Affiliation:

Subject: Scoping Plan  
Comment:

Dear ARB Board Members,

Environment Now is a Southern California private foundation committed to improving our air quality through smart land use.

We strongly support redoubling the land use target from 5 MMT to 11-14 MMT in the AB 32 Scoping Plan.

Setting a higher target for the land use sector sends a signal that land use sector that this is a top priority, and that regions should aim high and take decisive action to reduce greenhouse gas emissions from new developments.

A higher target must be coupled with a commitment to providing financial resources, technical assistance and other support to help regions, local governments, and transportation agencies achieve the target. A higher target will also signal to the state of California that land use should be a high priority for financial and technical assistance to meet the goals of AB 32.

A low target will send the signal that business-as-usual development should continue, and that land use is not a high priority for resources and support.

Sincerely,  
Mara Elana Burstein  
Sustainability & Communications Program Manager

Environment Now  
2515 Wilshire Boulevard  
Santa Monica, CA 90403  
tel: 310-829-5568 ext. 245  
fax: 310-829-6820  
[www.environmentnow.org](http://www.environmentnow.org) <<http://www.environmentnow.org>>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:12:17

No Duplicates.

## **Comment 292 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Arthur

Last Name: Unger

Email Address: artunger@att.net

Affiliation:

Subject: Solar on the roof and decreasing GHG production

Comment:

Most localities, especially those in the San Joaquin Valley, can reduce greenhouse gas emissions from new development by requiring photo-voltaic panels on the roof of all commercial, industrial and residential buildings, both existing and being built. (Installation is cheaper if done while a structure is being built.) Sunshine is abundant in California, especially in the San Joaquin Valley. We usually need to turn on our least efficient natural gas fired plants to power our air conditioners in the afternoon; that is just when we would be generating the most electricity from the sun. Solar PV maintenance costs are low enough to allow home owners to save more on their first several years of electric bills than they pay to install solar. Government subsidies are available. (New Paragraph)

Requiring LEED buildings, white roofs and water conservation (pumping takes energy) are other ways local government can decrease energy use and thus carbon dioxide production. We should outlaw watering lawns. (New Paragraph)

Please make the land use target for local governments at least 14 MMT.

Thanks, Art

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:12:53

No Duplicates.

**Comment 293 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: mike

Last Name: hall

Email Address: mhall@hallmarkcommunities.com

Affiliation:

Subject: New homes vs. greenhouse gasses

Comment:

Requiring new homes to be responsible for green house gases is irresponsible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:19:45

No Duplicates.

## **Comment 294 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: terry

Last Name: allbritain

Email Address: tallbritain@Hunsakersd.com

Affiliation:

Subject: AB 32 Reducing Greenhouse Gas

Comment:

Anything that puts more burden on the cost of building and buying a home is not what this economy needs right now. I have been in the Civil Engineering Budgeting industry for 22 years and some homes in San Diego already have Agency Fees of over \$100,000 per home! This is just for a piece of paper to approve building a house!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:23:29

No Duplicates.

**Comment 295 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kyra

Last Name: Ross

Email Address: mmckelvey@cacities.org

Affiliation: League of California Cities

Subject: League of California Cities - Supplemental Comments on ARB's Scoping Plan  
Comment:

Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1242-ab\\_32\\_scoping\\_plan\\_loc\\_comments\\_-\\_supplemental\\_12-4.pdf](http://www.arb.ca.gov/lists/scopingpln08/1242-ab_32_scoping_plan_loc_comments_-_supplemental_12-4.pdf)

Original File Name: AB 32 Scoping Plan LOC Comments - Supplemental 12-4.pdf

Date and Time Comment Was Submitted: 2008-12-05 14:26:33

No Duplicates.

**Comment 296 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lori Ann

Last Name: Fry

Email Address: lfry@landam.com

Affiliation:

Subject: Approval of AB32 Scoping Plan to reduce Greenhouse Gas Emissions in California

Comment:

Please approve this initiative....

Thank you,

Lori Ann Fry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:28:45

No Duplicates.



**Comment 297 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Brian

Last Name: Maas

Email Address: bmaas@cncda.org

Affiliation: California New Car Dealers Assn.

Subject: Scoping Plan - Feebates

Comment:

Attached please find our comment letter on feebates as the preferred alternative to the Pavley regulations in the event those rules are not implemented.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1246-ltr\\_nichols-\\_feebates\\_12-5-08\\_-\\_final\\_pdf\\_version.pdf](http://www.arb.ca.gov/lists/scopingpln08/1246-ltr_nichols-_feebates_12-5-08_-_final_pdf_version.pdf)

Original File Name: Ltr Nichols- Feebates 12-5-08 - FINAL PDF Version.pdf

Date and Time Comment Was Submitted: 2008-12-05 14:29:01

No Duplicates.

**Comment 298 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mike

Last Name: Sirkis

Email Address: mws@highlandpartnership.com

Affiliation:

Subject: Voting in favor

Comment:

Yes - Approval of AB 32 Scoping Plan to Reduce Greenhouse Gas Emissions in California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 14:47:36

No Duplicates.

## **Comment 299 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: David

Last Name: Morrow

Email Address: dmorrow@swca.com

Affiliation: Air Quality Specialist - SWCA

Subject: Transportation sector GHG emission strategy

Comment:

ARB staff,

On page 38 of the Proposed Scoping Plan (Oct. 2008) the following is stated: "Passenger vehicles are responsible for almost 30 percent of California's greenhouse gas emissions. To address these emissions, ARB is proposing a comprehensive threeprong strategy - reducing greenhouse gas emissions from vehicles, reducing the carbon content of the fuel these vehicles burn, and reducing the miles these vehicles travel."

I propose a fourth prong to the approach: improved urban transportation efficiency.

I have a specific idea in mind that would: 1) reduce idling emissions, 2) overall travel time on urban streets, 3) vehicle acceleration emissions (which produce substantial CO<sub>2</sub> - especially heavy trucks). My proposal involves replacing stop lights and/or stop signs with modern roundabouts because they are far more efficient.

As documented in the transportation literature, modern roundabouts move cars through an intersection about 30% to 50% more efficiently than a signal or stop sign during peak hours. There are about 250,000 stop lights in the USA (DOT 2006) and, based on population, I estimate about 10% of these are in California - or roughly 25,000 stop light controlled intersections. I have conducted research on CO<sub>2</sub> reductions possible from stop lights being replaced with a modern roundabout. The estimates for efficiency vary with local conditions (e.g., traffic volume, number of intersecting streets). As a general rule, the annual reductions in CO<sub>2</sub> range from about 300 tons/year to over 3,300 tons/year.

What type of GHG emission reductions are available for California?

Assuming CO<sub>2</sub> reductions at the low end - perhaps 500 tons/year, and roughly 1/2 of California stoplights amenable for conversion to a modern roundabout, then a conversion measure could yield a permanent reduction of about 6 million tonnes CO<sub>2</sub>.

There are other benefits from signal conversion that could accrue as well, because roundabouts reduce injury accidents by about 60%, they work when the power fails, and they can be used for community beautification with landscaping and sculptures (e.g. Bend, Oregon).

There would also be tremendous time saving for delivery vehicles and other travelers at peak hour. For instance, the average peak-hour delay at a roundabout is seven seconds, vs a minute or more at a stop light. Do the math on idle emissions!

I have attached a zip file with several example documents for your use. Please consider adding improved urban transportation efficiency to the PSP as a fourth prong. This is a simple, cheap, and proven way to reduce GHG emissions from the transportation sector.

respectfully,

David Morrow AICP

ps: France is building about 1,000 roundabouts annually primarily to increase safety. We are a bit behind but can catch up.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1280-emissions\\_reduction\\_round\\_about\\_calculation.zip](http://www.arb.ca.gov/lists/scopingpln08/1280-emissions_reduction_round_about_calculation.zip)

Original File Name: Emissions\_Reduction Round About Calculation.zip

Date and Time Comment Was Submitted: 2008-12-05 15:11:42

No Duplicates.

**Comment 300 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gayle  
Last Name: McLaughlin  
Email Address: mayor@officeofthemayor.net  
Affiliation: Mayor, City of Richmond

Subject: Increase reduction levels of GHG in AB Scoping Plan  
Comment:

Please see uploaded file requesting CARB increase the reduction levels from 5 to 11-14 MMT of GHG in the Scoping Plan.

Thank You,

Gayle McLaughlin  
Mayor, City a Richmond  
Member of East Bay Green Corridor Partnership

Jim Rogers  
Richmond City Councilmember

Attachment: [www.arb.ca.gov/lists/scopingpln08/1281-carb\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/1281-carb_letter.pdf)

Original File Name: CARB letter.pdf

Date and Time Comment Was Submitted: 2008-12-05 15:15:13

No Duplicates.

## **Comment 301 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Eileen

Last Name: Reynolds

Email Address: ereynolds@tejonranch.com

Affiliation: Tejon Ranch, V.P., Government Affairs

Subject: Please Do Not Increase Transportation Targets Beyond 5 MMT

Comment:

Dear Chairperson Nichols and Members of the Board,

On behalf of Tejon Ranch, I am writing to urge you NOT to increase the greenhouse gas reduction target from regional transportation-related emissions beyond the currently proposed 5 million metric tons (MMT) in the AB 32 Scoping Plan. As a diversified real estate and agribusiness company that has demonstrated its commitment to the environment through its landmark Conservation and Land Use Agreement, we believe it is inappropriate for the Board to arbitrarily double the target without allowing the new Senate Bill 375 process to begin and prove successful.

We believe CARB action to double the target now would undermine the carefully negotiated outcome produced by the Legislature in SB 375. Since it sets out the process to determine the actual regional transportation-related GHG targets, it must be allowed to work and should not be preempted by the Board at this early stage.

We all have a vested interest in the success of the carefully crafted SB 375 and AB 32, but we must be cognizant of the fragile state of our economy and the need to base decisions on sound science. At this time, we strongly urge you NOT to increase the regional transportation-related targets beyond the current proposal of 5 MMT.

Thank you for your consideration of our position.

Sincerely,

Eileen Reynolds  
Vice President, Government Affairs  
Tejon Ranch Company

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-05 15:17:02

No Duplicates.

**Comment 302 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard

Last Name: Lyon

Email Address: rlyon@cbia.org

Affiliation: CA Building Industry Association

Subject: Supplemental comments on Scoping Plan

Comment:

Thank you

Attachment: [www.arb.ca.gov/lists/scopingpln08/1288-cbia\\_final\\_carb\\_comments\\_attachment\\_b.zip](http://www.arb.ca.gov/lists/scopingpln08/1288-cbia_final_carb_comments_attachment_b.zip)

Original File Name: cbia final CARB comments Attachment B.zip

Date and Time Comment Was Submitted: 2008-12-05 15:41:20

No Duplicates.



**Comment 303 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gretchen

Last Name: Hardison

Email Address: gretchen.hardison@lacity.org

Affiliation: City of Los Angeles

Subject: Proposed AB32 Scoping Plan Comments

Comment:

Please see attached comments from City of Los Angeles staff on the October 2008 Proposed AB32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1293-final\\_cmt\\_ltr\\_on\\_10-08\\_scoping\\_plan\\_to\\_arb.pdf](http://www.arb.ca.gov/lists/scopingpln08/1293-final_cmt_ltr_on_10-08_scoping_plan_to_arb.pdf)

Original File Name: Final cmt ltr on 10-08 Scoping Plan to ARB.pdf

Date and Time Comment Was Submitted: 2008-12-05 16:28:09

No Duplicates.

**Comment 304 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Rusty

Last Name: Selix

Email Address: rselix@calcog.org

Affiliation: CALCOG

Subject: Comments on AB 32 Scoping Plan

Comment:

On behalf of the California Association of Councils of Governments (CALCOG), we are submitting a letter expressing concerns on two matters in the Scoping Plan to be considered on December 11, 2008. Those concerns are included in the attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1295-121108\\_comments\\_to\\_arb\\_on\\_ab\\_32\\_scoping\\_plan\\_final1.doc](http://www.arb.ca.gov/lists/scopingpln08/1295-121108_comments_to_arb_on_ab_32_scoping_plan_final1.doc)

Original File Name: 121108 Comments to ARB on AB 32 Scoping Plan\_final1.doc

Date and Time Comment Was Submitted: 2008-12-05 16:38:53

No Duplicates.

**Comment 305 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Carol  
Last Name: Misseldine  
Email Address: cmisseldine@comcast.net  
Affiliation: Green Cities California

Subject: Supplemental comments on AB 32 Scoping Plan  
Comment:

Attached please find additional comments on the AB 32 Scoping Plan.

Thank you,

Carol Misseldine, Coordinator  
Green Cities California

Attachment: [www.arb.ca.gov/lists/scopingpln08/1296-gcc\\_ab\\_32\\_comments.additional.v2.doc](http://www.arb.ca.gov/lists/scopingpln08/1296-gcc_ab_32_comments.additional.v2.doc)

Original File Name: GCC AB 32 Comments.Additional.v2.doc

Date and Time Comment Was Submitted: 2008-12-05 16:49:50

No Duplicates.

## **Comment 306 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ronald

Last Name: Stein

Email Address: rstein@PTSstaffing.com

Affiliation: Principal Technical Services, Inc.

Subject: Concerns about the cost of AB32

Comment:

Over the last several decades California's heavy taxes and extensive bureaucratic regulatory requirements on businesses has established a poor track record of attracting new business into the state and has conversely been successful at driving businesses out of California to more business friendly States. Putting more cost onto businesses, and ultimately onto the tax paying citizens of CA would perpetuate reasons to leave California and thus further reduce a source for the taxes needed to support regulations that are more excessive than the other 49 States.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1300-concerns\\_about\\_cost\\_of\\_ab32.doc](http://www.arb.ca.gov/lists/scopingpln08/1300-concerns_about_cost_of_ab32.doc)

Original File Name: Concerns about cost of AB32.doc

Date and Time Comment Was Submitted: 2008-12-06 06:07:43

No Duplicates.

**Comment 307 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Meredith

Last Name: Niles

Email Address: meredith@icta.org

Affiliation: Cool Foods Campaign-Ctr for Food Safety

Subject: Cool Foods Campaign- Center for Food Safety comments

Comment:

Please find attached the comments of the Cool Foods Campaign and the Center for Food Safety.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1305-ab\\_32\\_proposed\\_scoping\\_plan\\_comments.doc](http://www.arb.ca.gov/lists/scopingpln08/1305-ab_32_proposed_scoping_plan_comments.doc)

Original File Name: AB 32 proposed scoping plan comments.doc

Date and Time Comment Was Submitted: 2008-12-06 16:58:34

No Duplicates.

## Comment 308 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: John A.  
Last Name: Paoluccio PE  
Email Address: johnpaoluccio@sbcglobal.net  
Affiliation:

Subject: Comments to reduce greenhouse gas emissions.  
Comment:

John Paoluccio Consulting Engineers, Inc.  
P.O. Box 1316, 5038 Salida Blvd., Salida, CA 95368  
Ph: 209-545-1661 Fax: 209-545-3533 Email:  
johnpaoluccio@sbcglobal.net  
California Registrations: Mechanical Engineer ME15046 Fire  
Protection Engineer FP248 Agricultural Engineer AG309

December 6, 2008

Clerk of the Board  
Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, CA 95814

Subject: AB 32 Scoping Plan  
Comments to reduce greenhouse gas emissions in  
California

Comments for review and For The Record and Ideas Submitted:  
Please forward copies to the above to appropriate departments. If  
requested, I can forward copies to any other party of interest.

In order to make a major impact on reducing greenhouse gas  
emissions in California due to fossil fuel use, it is also  
necessary to look at Global solutions in addition to all the local  
solutions.

The following is a compilation of specific areas where significant  
pollution reductions can result in less carbon dioxide, methane and  
other GHG's including PM10 and PM 2.5 from entering our  
environment.

These pollution reductions items include the following:

1. Wood Burning - Including Open Burning of Orchard Prunings.
2. TABLE "A" - COMPARISON of CONTAMINATES & PROBLEMS caused by:  
OPEN BURNING OF DRY WOOD Versus DECOMPOSITION.
3. Diesel Irrigation Pumps - Avoid electric motors.

4. PM10 & PM2.5 - Encourage non-till agricultural practices.
5. Forest Land - Capture biomass for useful purposes.
6. Energy - Encourage renewable energy in lieu of fossil fuel use.
7. BioCoal Fuel - A brief write up on one potential new useful carbon neutral fuel solution to reduce greenhouse gas emissions.

#### 1. Wood Burning of Orchard Prunings & Biomass Use

It is recommended that rules on open wood burning be relaxed. The burning of orchard pruning's results in considerably less polluting than any other option available today.

Biomass holds the promise of reducing fossil fuel use and can substantially help our energy production and dependency on foreign oil. If all open wood burning were stopped, our air quality would get worse not better.

Burning dry wood is natural and good for our environment and is an important part of the cycle of life on earth. Biomass takes in carbon dioxide during growth and gives it up during decomposition. However, when wet wood is burned incomplete combustion occurs with the release of substantial amounts of harmful GHG's. The burning of wet wood should be discouraged.

If wood is allowed to decay by natural means, including decomposition by ants, termites, microbes, fungus, etc. Then, carbon dioxide and methane gas is generated and released along with other GHG's. Methane is one of the major primary airborne contaminant generated on earth.

By burning the wood we simply release the stored solar energy and produce mainly water vapor and carbon dioxide. Better yet, waste wood can be collected, milled into pellets and used as a fuel in electrical power production.

If this renewable wood resource were burned in a biomass plant under ideal conditions, only a very small amount of pollutants would be emitted. We would derive substantial energy and reduce our dependence of fossil fuels. A win win situation that should be encouraged.

New technologies, inventions and processes that utilize renewable biomass offer many opportunities that can lead to a substantial reduction in fossil fuel use. These include bio-diesel, ethanol, and many others. Note: We are also involved in this effort. As an environmental engineer and inventor of environmental products we have been involved with energy systems, air pollution and converting biomass to practical use for over 40 years. BIOCOAL Fuel is our latest patent pending invention and it holds promise of converting wood into a clean burning fuel. See [www.biocoal.net](http://www.biocoal.net) for more information.

Technology and economics do not currently allow for many other practical options for the farmer other than to burn the prunings. Wood chipping and transporting the chips to a pellet mill or biomass plant would be ideal and may soon be practical as soon as

efficient biomass conversion to fuel becomes more acceptable. In the meantime, while it is not practical or economic to justify this method of energy conversion, it still is best to burn the wood prunings.

Farmers cannot allow prunings to build up year after year, allowing them to become a fire hazard and habitat for rats, ground squirrels and other vermin in addition to the decomposition gases produced. The practice of wood chipping has had mixed reviews. Some chips add to foreign matter in harvested almonds. To speed breaking down the chips they can be disked into the soil but that is contrary to the non-till practices that helps reduce fuel use and keeps PM10 and PM2.5 dust levels down. It becomes clear that there are no simple solutions to our many environmental problems but frequently, unnecessary regulations can result in more harm than good.

When dry wood is burned, as in the open burning of prunings, instant smoke and water vapor is visible along with carbon dioxide, carbon monoxide, methane and other GHG's plus ash being emitted. (Note: Dry pruning's may contain over 22% moisture.). When wood is left to decompose it may take years to break down but over 10 times as much methane may be generated. If one looks at the big picture it becomes clear that burning dry wood is a much more earth friendly choice.

The breakdown of wood products in forests, swamps, wetlands, farms, soil and landfills are some of the main producers of methane gas in our atmosphere. The pollution from farm burning, of hard to handle orchard prunings, is insignificant in comparison.

These no burn laws can result in considerable economic loss to the state, hurt farmers and taxpayers, and the resulting air pollution problem will become worse not better. It is in the best interest of the state that these anti wood burning laws and regulations be delayed, modified or rescinded until practical methods of transferring ag waste prunings to biomass facilities for efficient burning is worked out. In the meantime continued ag burning is far less polluting than not.

Throughout the United States attempts are being made to collect methane gas from landfills, sludge, animal waste, and other biomass sources and convert it into useful energy instead of allowing it to enter the atmosphere..

Let's relax open wood burning rules and allow farmers to continue with common sense management practices. This benefits us all with less regulation and less pollution.

2. TABLE "A" COMPARISON of CONTAMINATES & PROBLEMS caused by:

ITEM	OPEN BURNING	DECOMPOSITION
Visible Smoke		More*
Less	Minor Problem	
Water		More
Less		
Carbon Dioxide		More
Less		
Carbon Monoxide	Less	More*
Methane	Less	More*



Other gasses/ VOC's	Less		Much More*
Ash		More	
Less			
Soil Nutrients		Less	Much
More			
PM-10		Less	Much
More*	Major Problem		
PM-2.5		Less	Much
More*	Major Problem		
Rodent Habitat /Fleas		Less	Much
More*	Major Problem		
Fossil Fuel Use	Less		Much More*
	Worst Problem		
Added Carbon Dioxide	Less		Much More *
	Problem		
Expenses		Less	Much More*
	Problem		
Time/Manpower	Less		More*
	Problem		
Consumer Cost		Less	More*
	Problem		
Adverse Health Effects		Less	More*
	Problem		
Energy Policy		Good	Not
Good*	Problem		

Based on the above chart it would be much wiser to select open burning of dry orchard prunings where mostly water and CO2 are produced, plus ash & some other gasses. When prunings are stored, chipped, and then disked into the soil much more air pollution and other problems occur. Long range storage increases rat, mice, rodent and flea infestations that migrate to populated areas. Considerable PM 10 & PM 2.5 are generated due to chipping and discing chips into and disturbing the soil. Decomposition leads to the release of many greenhouse gasses. Plus 100% of the pollution from the fossil fuels used is added to our environment. All the collected suns energy is lost that could have been put to good use and a waste of a valuable biomass resource.

### 3. DUST - PM2.5 and PM10:

Significant increases in fine dust particles enter the air when farm practices are changed from non-till operations to discing in wood chips. The fine dust increase may easily be 10 fold or more. Many farmers have changed to non-till operations and the results have proven to be very beneficial to reducing dust generation. Dust mites and other pest problems are reduced with non-till operations.

CROPS: In general, it is beneficial to keep orchards and other ag properties clean of waste biomass and minimize unnecessary equipment use. Excess fuel consumption and putting dust into the air is not helpful to plant tissue.

Regulations should be modified to allow for best management practices to prevail.

### 4. Forest Measures:

The environment would be better served if dead forest timber and debris were harvested for commercial use. If left to stand and ultimately decompose or catch on fire, it produces significant quantities of carbon monoxide, methane and other GHG's.

By harvesting dead timber and clearing built up debris, new growth will be encouraged. It is new growth that extracts more carbon dioxide from the air. That does a tremendous amount of short term good in reducing air pollution. And a new healthy forest is generated.

New potential breakthrough: One major problem with all forms of carbon sequestering is that when wood decomposes the captured carbon is released back into the air environment and the stored suns energy is lost. What is needed is a method to interrupt the Carbon Cycle to prevent the wood from decomposing for the long term. We have developed a patent pending new processing method to accomplish this with a carbon offset product called BioCoal Fuel. Tests have shown the new bio-fuel is hydrophobic, is resistant to decomposition by insects, ants, termites and microbes. This breakthrough and other new processes that utilize renewable energy biomass offer the best opportunity to solve our air pollution problems as we turn away from fossil fuels. More information is available at [www.biocoal.net](http://www.biocoal.net). It will no doubt take many new energy solutions and it would be very helpful if the ARB would devise a Product and Process Evaluation Form that lists the pros and cons for any and all new methods to reduce greenhouse gas emissions. This may include energy input to produce one pound of bio-fuel, heat output available per pound of bio-fuel, gasses generated, ash generated, soil, liquid or gas form, etc.

#### 5. STATIONARY DIESEL ENGINE CONTROL MEASURES

(The conversion of irrigation diesel pumps to electric motors.)

The ARB regulations are intended to reduce diesel exhaust emissions from the estimated 8,600 stationary engines operating Ag irrigation pumps. The regulations require that old diesel engines to be replaced with more efficient diesel engines or electric motors. Farmers would most likely install electric motors in lieu of the more complex and expensive new type diesel engines. The changeover should be voluntary.

When a large percentage of the 8,600 engines are converted to electric motors, the electric power grid will have to accommodate the additional peak load of all the engines converted. Power plant inefficiencies and transmission losses are several times the end load and that would result in more pollution generated at the power plant.

Throughout the world, most nations use coal as the primary fuel for producing electricity. Coal is the cheapest and the dirtiest of the fossil fuels. California has in recent years shifted more to natural gas for electric power production. Natural gas is expensive and the cleanest burning of the fossil fuels but is limited in supply and the general population depends on it for home heating.

Imported electric power from other states must meet new strict pollution standards that many coal plants have difficulty meeting. California has been known to be a leader in environmental matters and technical advances. However, other states and nations that depend on coal use do not have the option for natural gas use. In order to make a major impact against Global Warming we must reduce mainly coal and other fossil fuel use. As natural gas becomes

scarcer California will need to rely on more coal use. California should encourage coal fired plants to utilize co-firing with biomass to reduce the net carbon dioxide emissions to less than natural gas fired power plants.

It is also recommended that a cost analysis and comparison of the pollution generated from leaving the diesel engines "as is" versus, changing them over to electric motors be conducted, prior to making any changes. The change option should be left to the farmer or pump user.

Most of the diesel pumps are used for occasional pumping and operate a small number of hours per year. Unlike electric power, the diesel powered engine does not have the tremendous transport losses of energy. It is its own power plant. From an energy and pollution standpoint, the diesel engine should generate less pollution than converting the pump to electric power. The use of independent diesel engines is a smart design and puts no strain on our electric grid system.

Results that may occur if diesel engines are converted to electric motors:

- Converting to electric use may end up with more fossil fuel being used.
- Fossil fuel energy is consumed to manufacture the new electric motors.
- Conversion adds significant peak loads to the electric power grid.
- New electric power plants will need to be constructed.
- Additional power will need to be purchased from out of state.
- Peak summer loads would be detrimental to the electric power grid.
- Consider the high cost of replacing pump engines with motors.
- More fossil fuel use results in more carbon dioxide and other pollution.
- The cost for implementing this regulation may run in the billions of dollars.
- Add all the additional paperwork, frustration and manpower.
- Farm product costs will increase and taxpayers will pay more.
- Californian farmers will be less competitive, imports increase and jobs lost.

We should be trying to discourage peak electric power use and encourage conservation and more renewable energy use. The periodic operation of diesel driven pumps keeps the power needs "off" of the electric grid.

We should also encourage farmers to consider using renewable bio-diesel fuel to reduce net air pollution and improve existing engine efficiency.

6. Energy - Encourage renewable energy in lieu of fossil fuel use.

Energy exists in many forms. Most of the energy we use is derived from the sun. This includes fossil fuels, biomass, wind energy and hydroelectric power. Carbon is the building block of life and is in all fossil fuels, wood, and all plant and animal life. Fossil fuels may contain 70 to 95% carbon and wood, trees and plants may have approximately 50% carbon.

The Carbon Cycle on earth, in a simplistic example as follows: plants take in carbon dioxide during growth in sunlight. The carbon from the carbon dioxide gas is changed into a concentrated solid form that includes sugars and other plant tissue. The plant is in essence a solar battery that harnesses the sun's stored energy.

When plants die, decompose or when burned, the captured carbon compounds are released back into the ambient air and the sun's energy is released.

This cycle has been repeating itself for millions of years. Using biomass for fuel offers the most opportunity for the near term solution to reducing Global Warming.

#### 7. BIOCOAL Fuel - A Potential Global Solution to Global Warming & Climate Change.

Developing useful energy from renewable biomass is gaining global attention. Many scientists believe that biomass holds the key to solving our global energy and pollution problems. We agree and have been involved in this effort.

As one of many firms involved with developing new and improved energy systems we wish to share our information as an example of a promising new biomass processing method in helping solve our global energy and pollution problems.

The new fuel is an enhanced form of biomass in the form of torrefied wood pellets. A high temperature "immersion conduction" processing system removes the water and VOC's from the wood and treats the wood in an oxygen free environment. The wood pellets undergo an endothermic reaction where the molecular structure and chemistry is altered to a plastic like state so it burns clean. This new fuel is considered a near term solution and could be brought on line in months to immediately provide renewable energy and reduce pollution. It may be a global solution to the world's energy and pollution problems.

Over 8 billion tons of coal equivalent fossil fuel is used each year. The market for this new fuel includes co-firing with coal and replacing coal in the long term for clean electric power generation. It has immediate application as a long life storable product for "Carbon Offsets". This fuel allows existing coal fired plants to co-fire and lower greenhouse gas emissions. It also becomes an ideal feedstock for gasification systems.

No changes to existing coal fired plants are required. The new fuel is friable and can be co-fired at 15% in the near term and 100% in the long term. In a preferred form of the invention the product is in the form of Enhanced Torrefied Wood Pellets. All fossil fuels, like biomass, contain carbon and hydrogen atoms in long chains. The fossil fuels have high carbon content with little moisture. Wood materials contain high levels of moisture and volatile organic compounds that result in incomplete combustion when burned. That is one of the reasons wood is not generally accepted as a practical fuel for energy production. Through a new "Conduction" processing method this technology can quickly turn biomass into clean burning BIOCOAL Fuel. This renewable energy fuel is essentially moisture free with very little VOC's. The heat content is over 10,000 Btu per pound. The products of combustion are mainly water and (neutral) carbon dioxide. The new process

produces finished product quickly, efficiently, economically, and with little energy use. No outside power is needed for large self contained facilities.

The energy from the sun holds the best promise of solving our global energy and pollution problems. Biomass is the most plentiful source of renewable concentrated carbon but until now, all attempts to utilize this free source of the sun's energy has met with technical difficulty and costly extraction solutions. Bio-diesel and ethanol are examples of the liquid forms of bio-fuels that require complex processing and high energy use to turn the biomass into usable forms of energy. Virtually all other biomass forms of energy have run into similar technical difficulties and that is why they are not used extensively. What has been needed is a breakthrough in converting wood into a practical and clean fuel. BIOCOAL Fuel is one such breakthrough. It uses biomass feedstock such as pruning's, ag waste, landfill wood waste, forest debris, lumber waste, grasses, energy crops such as Switch grass, and many other biomass sources that would otherwise be left to decay, break down, decompose or be burned. When this occurs we lose all the benefits of the sun's energy plus we allow the re-entry of all the methane, carbon dioxide and other GHG's per the CARBON CYCLE of Nature. This new fuel product will not break down like wood and other plant material. It makes an ideal Carbon Offset because it resists all forms of natural decomposition. Plus it is a clean burning renewable energy fuel.

Global Warming and Climate Change caused by the burning of "non-renewable" fossil fuels and increases in the atmospheric concentration of Carbon Dioxide are considered the greatest threat to our environment today. Coal is considered the most polluting fuel as it contains many heavy metals, including sulfur, lead, mercury, and radioactive substances. Many countries use very poor grades of coal that contain considerably more toxic substances than the cleaner coal that is becoming scarcer. It may come as no surprise to learn that many of the health problems suffered today may be caused by the pollution from coal fired power plants. It is estimated that California receives over 25% of its air pollution from outside countries such as China and India. It may not be long when most of the most harmful pollution originates from outside the USA. It is to the benefit to all for California to lead the way in showing the world that the use of renewable energy should be a major priority. We must address the reduction of global coal use if we ever hope to solve our Global Warming and Climate Change problems.

With all the conservation efforts, new liquid bio-fuels being used, and improvements in transportation, the air pollution problem will still get worse until we find a new fuel for producing clean electric energy. The area of greatest need is the development of a new fuel to replace "COAL". BIOCOAL Fuel is a renewable energy solid fuel that is designed to replace coal. It can also reduce oil and natural gas use. BIOCOAL Fuel is the most practical utilization of the stored sun's energy in biomass. Not only does it burn clean but it utilizes all the waste biomass that if left to decompose, would re-introduce all the methane, carbon dioxide and other carbon compounds back into the environment plus wasting the stored sun's energy.

In addition to putting to use all the available waste biomass, changes will be required in land use issues related to the growing of energy crops such as Switch grass. New farming practices will put low quality land to use in growing energy crops, harvesting, milling and processing plants will also be needed. New industries would be formed and millions of new jobs would be created. We believe that biomass related solutions, and in particular, this

new technology has the long term potential of removing billions of tons of carbon dioxide every year from our global environment. Virtually all coal could stay in the ground and we would use oil for new products of the future. The BIOCOAL Fuel website can be viewed at [www.biocoal.net](http://www.biocoal.net).

Sincerely

John A. Paoluccio PE  
Engineer, Inventor and Farmer

Work: John Paoluccio Consulting Engineers, Inc. - Mechanical / Environmental

Work: Inventive Resources, Inc. - Environmental Products / BIOCOAL Fuel

P.O. Box 1316, 5038 Salida Blvd., Salida, CA 95368  
Ph: 209-545-1661 Fax: 209-545-3533  
Email: [johnpaoluccio@sbcglobal.net](mailto:johnpaoluccio@sbcglobal.net) [info@biocoal.net](mailto:info@biocoal.net)  
[www.JPCE.com](http://www.JPCE.com) & [www.biocoal.net](http://www.biocoal.net)

Home: Modesto, CA 95356. Farm - Operates a small almond orchard.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1307-chg\\_solutions\\_11-27-08.docx](http://www.arb.ca.gov/lists/scopingpln08/1307-chg_solutions_11-27-08.docx)

Original File Name: CHG Solutions 11-27-08.docx

Date and Time Comment Was Submitted: 2008-12-06 17:34:52

No Duplicates.

## **Comment 309 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Molly

Last Name: Brown

Email Address: molly@mollyyoungbrown.com

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

I understand that Siskiyou County has requested to be exempt from all air quality regulations, including AB 32. I do not know the basis for this request, but I do know that the Board of Supervisors has often tried to get around air quality requirements, or has ignored them altogether. As a citizen of Siskiyou County, I urge you to reject this request and hold Siskiyou County fully subject to all regulations. Additionally, I request that you monitor Siskiyou County closely in this regard.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 17:12:40

No Duplicates.

## **Comment 310 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dean

Last Name: Pernicone

Email Address: caldean@cox.net

Affiliation:

Subject: housing cap for emissions

Comment:

Targeting housing for emissions is just an environmentalists way of stopping development. Unless you are willing to cap all EXISTING HOMES as well.

This is blantly unfair and while all industries could be targets of caps, the same holds true for all industries as well as housing. You must CAP all existing as well as future developments equally or not at all. If this can't be done, then going after the biggest contributors is the only solution like utilities and autos.

Thank You

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-07 20:27:29

No Duplicates.



## **Comment 311 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Chandra

Last Name: Krout

Email Address: ckrou@ci.irvine.ca.us

Affiliation: City of Irvine Environmental Programs

Subject: City of Irvine Comment Letter for Draft Scoping Plan

Comment:

Dear Chair Nichols:

On behalf of the City of Irvine, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan). Please find attached the City's Comment Letter in the form of a PDF. A hard copy was also mailed to your attention on Friday December 5th, 2008. Thank you again for the opportunity to comment. The City of Irvine looks forward to working closely with the ARB in the future.

Sincerely,

Douglas Williford, AICP  
Community Development Director  
City of Irvine

Attachment: [www.arb.ca.gov/lists/scopingpln08/1319-carb\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/1319-carb_letter.pdf)

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2008-12-08 05:06:46

No Duplicates.

## **Comment 312 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Barbara

Last Name: Spoonhour

Email Address: spoonhour@wrcog.cog.ca.us

Affiliation: Western Riverside Council of Governments

Subject: Comments on the Proposed Scoping Plan

Comment:

The Western Riverside Council of Governments (WRCOG) staff wishes to commend the California Air Resources Board for its hard work on developing a statewide blue print to achieve the greenhouse gas emissions reductions mandated under AB 32.

WRCOG staff is providing the attached comments to the Proposed Scoping Plan. Please note that these comments have not been reviewed or endorsed by WRCOG's Executive Committee.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1321-carb\\_scoping\\_plan\\_commernt\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/1321-carb_scoping_plan_commernt_letter.pdf)

Original File Name: CARB Scoping Plan Commernt Letter.pdf

Date and Time Comment Was Submitted: 2008-12-08 07:18:22

No Duplicates.

## Comment 313 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Carolyn

Last Name: Chase

Email Address: cdchase@movesandiego.org

Affiliation: Move San Diego, Inc.

Subject: Critical importance of transit performance standards

Comment:

The Proposed Scoping Plan acknowledges (in the section Recommended Actions pages 47-50) that:

"Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in helping to reach regional targets." and

"Quality of life will be improved by increasing access to a variety of mobility options such as transit...."

Yet there is no strategic analysis of the performance requirements for "enhanced public transit service."

There seems to be an unexamined belief that simply providing more funding for transit will lead to reductions in vehicle-miles-traveled. However an examination of the facts - in San Diego County - shows the opposite. Even after of billions of dollars invested in Light Rail transit capital infrastructure, VMT has steadily increased. In fact, the existing RTP for the region, shows that even after all transit investments in the plan VMT will be increasing by 38.8% (UCSD Environment and Sustainability Initiative (ESI) Dec. 2008).

The region is approving significant density increases that are called "Transit Oriented Density" but that lead to significant traffic increases and a resulting backlash against density because the transit services are insufficient.

What can we conclude from this?

The transit projects need to change. Why?

Market research shows that unless transit trip times are competitive with driving times, drivers (especially in California) will not change to taking transit. The numbers of driver who will change without competitive trip times is not significant enough to either impact traffic or GHG emissions.

What works?

Applying global best planning practices here. It may indeed shock some, but we do not currently apply global best transit planning practices here in California - or the United States. There are many barriers to this and they need to be understood or else advancing billions into existing plans will actually setback our goals of mitigating climate change.

Please see the recent FTA Study: Advanced Network Planning for Bus Rapid Transit

<http://www.nbrti.org/docs/pdf/BRT%20Network%20Planning%20Study%20-%20Final%20Report.pdf>

The study's central finding is that the Quickway model which is little understood or practiced within the United States, can offer significant benefit to urban regions intent on creating more effective transit networks. More than being "the poor man's light rail," Quickways--fully grade-separated bus guideways--can cost-effectively support a range of local, express, and branching services that together create significant public value, lead to major increases in ridership, and even lead to "phase shifts" in the role that transit plays in a region. Quickways, rather than being a "stepping stone" to light rail, are rather a fundamental building block in creating transit networks better matched to modern city form.

In every international case cited, the Quickway model was chosen--or backed into--as a response to the absolute need to meet ambitious ridership or mode split targets which were developed exogenous to the transit planning process. For U.S. cities that choose to set similar targets, Quickway infrastructure and service planning can become powerful tools to helping achieve these goals.

Such targets need to be set by the State in order for projects to qualify for funding or to be consistent with any SB375 Sustainable Communities Strategy planning.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 09:04:43

No Duplicates.

**Comment 314 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tara  
Last Name: Schultz  
Email Address: [tschultz@cityofalhambra.org](mailto:tschultz@cityofalhambra.org)  
Affiliation: City of Alhambra

Subject: Comments to Proposed Scoping Plan  
Comment:

Attached please find a letter from Alhambra Mayor Barbara Messina regarding the City of Alhambra's concerns regarding the Proposed AB32 Scoping Plan.

If you should have any difficulty opening the file please contact me and I can try sending it in a different format.

Sincerely,  
Tara Schultz  
Deputy City Manager

Attachment: [www.arb.ca.gov/lists/scopingpln08/1332-airresourcesbd\\_12-08a.pdf](http://www.arb.ca.gov/lists/scopingpln08/1332-airresourcesbd_12-08a.pdf)

Original File Name: AirResourcesBd\_12-08a.pdf

Date and Time Comment Was Submitted: 2008-12-08 09:05:52

No Duplicates.

## **Comment 315 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Amy D.

Last Name: Kyle

Email Address: adkyle@berkeley.edu

Affiliation: University of California Berkeley, SPH

**Subject: Public Health Implications of AB 32 Alternative Mitigation Policy Proposals**

**Comment:**

Public Health Implications of AB 32 Alternative Mitigation Policy Proposals

Thank you for the opportunity to comment on the October draft of the Scoping Plan for the California Global Warming Solutions Act of 2006. It is critically important to reduce greenhouse emissions and build a clean and sustainable energy system that can support the economy without destroying the global environment. I deeply appreciate the diligent efforts of the staff to address these complex issues.

The plan represents a portfolio of policy proposals. My focus is on assessment of their public health implications. The October revision reflects greater recognition of the importance of engaging the public and coordinating efforts with local governments, especially on issues related to the built environment, land use, and transportation and their implications. These are important improvements.

What the Air Resources Board still needs to do is to discuss the relative merits of the available policy alternatives.

Alternatives under consideration would be expected to vary with regard to their public health impacts. Consideration of the differences in public health impacts would inform the Board's deliberations. Moreover, public health benefits also have economic benefits that would be relevant to selection of cost effective measures.

Some reasons that alternatives might differ in their public health impacts are:

- Actions that reduce CO2 emissions but retain combustion technologies will generally have fewer public health benefits than those that eliminate combustion and resulting co-pollutants.
- Actions that reduce combustion or invest in clean and sustainable technologies or create other environmental benefits in proximity to populations, particularly vulnerable populations and communities, will have greater public health benefits than those that do not.
- Actions that build clean and sustainable energy infrastructure and energy security for communities will have greater public health benefits than those that merely reduce emissions.

- Actions that reduce greenhouse emissions by improvements to the built environment can also address important environmentally mediated conditions such as diabetes and obesity so would have public health benefits beyond reductions in air pollution.
- Actions that enhance the ability of the public to participate and contribute to solutions are more likely to reflect the public interest and so promote public health than those that do not.

If the Board is going to adopt the policy strategies as presented, it might consider commissioning a comparative review of the public health and overall public benefits of policy alternatives to be completed before regulations are adopted. In addition, the Board may wish to consider directing the staff to set up means to track the implementation of policy measures to allow on-going, objective determination of whether the strategies are achieving the policy aims of the statute.

The State of California is critical to the development of a just and sustainable model for how to address climate change and lead a conversion to a new energy system. As Governor Schwarzenegger points out, California leads the world. The best model California could present would reduce emissions while promoting public health, democracy, and civic engagement; protect and enhance vulnerable communities; and build the clean and sustainable energy system that we need for the future.

Thank you for your consideration of these comments. Details are in the attachment.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1337-adk\\_ab32scoping\\_12.08.08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1337-adk_ab32scoping_12.08.08.pdf)

Original File Name: adk\_AB32Scoping\_12.08.08.pdf

Date and Time Comment Was Submitted: 2008-12-08 09:23:14

No Duplicates.

## **Comment 316 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tim

Last Name: Kane

Email Address: timkane@mbk.com

Affiliation:

Subject: SB 375 and AB 32

Comment:

As someone who lives in California and is concerned about GHG emmissions, I have a vested interest in the success of SB 375 and AB 32. I also have a vested interest in helping the state out of its current and profound economic malaise. Imposing out-of-proportion burdens on new housing will neither help our struggling economy nor realistically achieve our AB 32 goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 09:54:33

No Duplicates.



## **Comment 317 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ray  
Last Name: Pingle  
Email Address: Ray\_Pingle@msn.com  
Affiliation: Sierra Club California

Subject: Economic Analysis Supplement  
Comment:

Dear CARB,

Overall, we generally support the process and conclusions of the Economic Analysis Supplement to the Proposed Scoping Plan but believe that it is missing one key piece of information related to the enormous detrimental economic impacts of adaptation to and damage to real estate assets and many sectors of our economy due to unmitigated climate change.

As discussed in the attached document, the content of the Next 10 Report (The new one just released in November, 2008 entitled California Climate Risk and Response by David Roland-Holst, et al.) estimates the range of the economic costs of adaptation and the costs of economic damage to the State of California resulting from unmitigated global warming. We believe that much of the content of this report should be included in the Economic Analysis. While some may express concern about possible small detrimental effects to mitigate global warming in narrow segments of the economy, they pale in comparison to the many orders of magnitude impact of not acting aggressively now as explained in this report. We believe that the Economic Analysis Supplement is materially incomplete by not including reference to this critically important information.

This report is available at the Next 10 web site at [http://www.next10.org/research/research\\_ccrr.html](http://www.next10.org/research/research_ccrr.html).

Thank you for your kind consideration.

Sincerely,

Ray Pingle

Attachment: [www.arb.ca.gov/lists/scopingpln08/1342-etaac\\_mtg\\_12-5-08.doc](http://www.arb.ca.gov/lists/scopingpln08/1342-etaac_mtg_12-5-08.doc)

Original File Name: ETAAC Mtg 12-5-08.doc

Date and Time Comment Was Submitted: 2008-12-08 09:55:01

No Duplicates.

**Comment 318 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sid

Last Name: Abma

Email Address: Sidelusa@aol.com

Affiliation: Sidel Systems USA Inc.

Subject: Scoping Plan 2008

Comment:

Good day Ms. Nichols

Please see attached letter. I look forward to your reply.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1344-carb\\_letter.doc](http://www.arb.ca.gov/lists/scopingpln08/1344-carb_letter.doc)

Original File Name: CARB letter.doc

Date and Time Comment Was Submitted: 2008-12-08 10:02:31

No Duplicates.

## **Comment 319 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dan  
Last Name: Lloyd  
Email Address: danrlloyd@yahoo.com  
Affiliation:

Subject: AB32 Scoping Plan Recommendations  
Comment:

Dear CARB Members,

I am contacting you to express my concerns about the proposed regulations regarding GHG emissions reduction recommendations that your Board is set to consider this Thursday. From my review of the recommendations, they do not seem to be based on any real science or demonstrable evidence that the proposed standards are economically sound or that the cost/benefit has been established.

We all want to be prudent when it comes to implementing standards to improve the performance of new buildings, however, we all must be looking at the economic burden we accept in conjunction with the benefit we all will derive. In other words, the cost to achieve the benefit needs to be reasonable and balanced with the resulting reduction. The question we must ask ourselves is whether the economic burden placed on new construction is the best use of dollars for the reduction in GHG that we may realize.

I strongly suggest that you ask for a complete economic analysis of the costs to implement these regulations with respect to the anticipated reduction in GHG emissions for new construction.

Sincerely,

Dan Lloyd

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 10:55:37

No Duplicates.

## **Comment 320 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Shanee

Last Name: Stopnitzky

Email Address: shanee.stopnitzky@sce.com

Affiliation:

Subject: ab32 in the interest of the public

Comment:

Global warming is the challenge of our generation. Meeting this challenge requires fundamental changes in the way we grow our communities.

CARB should raise the land use target in the AB 32 Scoping Plan from 5 million metric tons of CO2 equivalent (MMT) to 11-14 MMT. As shown by the analysis of Dr. Reid Ewing and Dr. Arthur C. Nelson, the 5 MMT target is based upon models that are widely acknowledged to underestimate the benefits of dense, mixed-use development, while the higher target is achievable with policies California is already considering.

Setting a higher target for the land use sector will signal to the world that new land use patterns are a high priority in the fight against global warming. Conversely, a low target will send the signal that business-as-usual development should continue, and that land use reform is a low priority for California.

A higher target must be coupled with a commitment to provide financial resources, technical assistance, and other support to help regions, local governments, and transportation agencies achieve the target.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:22:32

135 Duplicates.

**Comment 321 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard  
Last Name: Rypinski  
Email Address: rrypinski@comcast.net  
Affiliation:

Subject: AB32 Scoping Plan  
Comment:

Please appreciate the urgency many of us feel about dealing with global warming. Please approve a scoping plan that ties land-use to reduction of greenhouse gases.  
Richard Rypinski

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:32:16

No Duplicates.

**Comment 322 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard

Last Name: Caputo

Email Address: richardcaputo@sbcglobal.net

Affiliation:

Subject: Land Use Reform is Vital to Deal with Climate Change

Comment:

It is time to bring some intelligence to how we allow communities to be developed so that our current reliance on the automobile will change over the next decades. Do it!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:35:00

No Duplicates.

**Comment 323 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Sullivan

Email Address: bubbacooti@comcast.net

Affiliation:

Subject: Support AB 32

Comment:

This needs to be supported to protect our future. It's time to take a longer look and forego immediate profits, time to resist those short-sighted money makers only interested in themselves and their shallow trophies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:36:35

No Duplicates.

## **Comment 324 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Cynthia  
Last Name: McCall  
Email Address: cindymccall@hotmail.com  
Affiliation: Santa Barbara County Releaf

Subject: AB 32 Scoping Plan  
Comment:

Thank you for your time and consideration of my comments.

The time has past for business as usual in our plans to reduce Greenshouse Gas Emissions in California. Planning for the 20th Century is not going to provide for children, parents and business for the 21st Century.

Alternative transportation is the only way to keep up the pace of growth and population in California. An omission of creative forward thinking for addressing this serious health issue is irresponsible to our public.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 11:52:08

No Duplicates.



**Comment 325 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jeff

Last Name: Knapp

Email Address: erisa@reninet.com

Affiliation:

Subject: global warming threat

Comment:

I urge you to take all the steps possible to reduce emissions of greenhouse gasses. Our current economic crisis is dwarfed by the health, safety and huge, global economic impacts of increased global warming.

Jeff Knapp, Arcata CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 12:25:32

No Duplicates.

## **Comment 326 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Loren

Last Name: Amelang

Email Address: loren@pacific.net

Affiliation:

Subject: Higher target for the land use sector - Please!

Comment:

Before I became a prisoner of my car in this beautiful but rural area, I lived within walking distance of a BART station. I could literally walk out my front door and go anywhere in the world without needing to drive at all. Sometimes entire months would go by with only walking, skating, or bicycle trips, not starting the car at all.

Now, every little errand requires a motor vehicle and at least as much time as it would have taken in the city, but that time is spent sitting behind the wheel instead of getting fresh air and exercise. Ironic, when I live in such a visually beautiful area.

My point to you is that even environmentally aware citizens like myself need assistance and encouragement when evaluating land use choices. Breaking the idea that driving everywhere is "normal" will require public sector incentives at all levels, but reforming land use policies may be the most fruitful.

Thank you,

Loren

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 12:25:46

No Duplicates.

## **Comment 327 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: George

Last Name: Hartwell

Email Address: chaparral95640@hotmail.com

Affiliation:

Subject: AB 32

Comment:

Every member of the CARB must approve the AB 32 scoping plan. Don't listen to the arguments of developers and local governments who would prefer AB 32 dies a fast death. The developers are interested only in money; motivated by greed. Local government opponents are often beholden to developers. Consider foremost the long term impacts of greenhouse gas emissions produced in California. Support the AB 32 Scoping Plan to Reduce Greenhouse Gas Emissions in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 12:40:51

No Duplicates.

## **Comment 328 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Eric

Last Name: Jung

Email Address: eric@bearvalleyrealestate.com

Affiliation:

Subject: AB32

Comment:

I support tighter regulations to reduce greenhouse gas emissions. Regardless of whether man is causing or contributing to global warming, there are plenty of other good reasons to reduce emissions, not least of which is the fact that California now rates only 24th in quality of life in the U.S., in great part due to bad air quality. We can do better. And California in the past has been a world leader in scientific and environmental response. We're slipping. Please help.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 13:09:43

No Duplicates.

## **Comment 329 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gerald  
Last Name: Cauthen  
Email Address: cautn1@aol.com  
Affiliation:

Subject: AB 32  
Comment:

CARB will be playing a vital role in ensuring California's environmental and economic future viability. People are therefore counting on your agency to do its job with vigor, determination and backbone.

First a word about SB 375. SB 375 was unfortunately seriously watered down, such that it grandfathers in virtually every transportation capital improvement project in sight, even those still in the early planning stages. For instance MTC's entire Bay Area transportation program covering the next 25 years was unaccountably exempted from the terms of SB 375. That leaves those of us concerned with improving California's transportation systems with AB 32 and CARB's AB 32 enforcement policies as our only hope. In fact it appears that the only hope of meeting the Governor's GHG reduction target lies in CARB and the way it implements AB 32.

It is of great importance therefore that you adopt and enforce a tough and consistent standard in the following three areas:

First, strict new land use controls must result in new residential and commercial development being clustered around transit nodes....pushback notwithstanding.

Second, the era of highway expansion and huge public transit boondoggles, both of which are still ongoing in the Bay Area, must end. Highway funds should be used to maintain and improve existing roadways, but without increasing their auto-carrying capacities. Transit funds should be directed to practical projects designed to render the overall public transit system much more useful and attractive to many more people.

Third, the public subsidies now lavished upon California's roadway users must be reduced. This could take the form of higher gas taxes, new roadway use fees, higher excise taxes, increased parking fees, or some combination thereof. A Japanese highway user is taxed over 20 times as much per mile as his American counterpart. Something's amiss, and it's not in Japan.

Thanks for reading this far; CARB has an extremely important job to do, and we wish you well.

Gerald Cauthen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 13:29:53

No Duplicates.

## **Comment 330 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Trixie

Last Name: Johnson

Email Address: trixiej@comcast.net

Affiliation:

Subject: Land use reduction targets to reduce GHG

Comment:

The final plan should have a much higher target for reductions achieved by more compact urban growth, coupled with assistance to local governments for planning and possibly even infrastructure costs associated with density (like increases in sewer capacity in areas going more dense than planned). Not only will this reduce GHG to a level closer to the necessary targets, but it also preserves more agricultural and open space land.

As a former San Jose Councilmember, I know that densification is difficult, but doable. It might help them to address community opposition if the added power of the state's GHG land use policies can be cited as part of the reason to increase densities. Too many cities have not, or are not, meeting the need to provide housing for a growing population, which also pushes growth into new areas. A tougher GHG policy will have the added benefit of encouraging cities to meet their housing goals.

I know you are receiving opposition from some builders of single-family housing. San Jose has shifted substantially from s-f to a much higher proportion of m-f and even high rise housing. There is no shortage of builders wanting to do the work -- and some s-f builders are moving into the mid-density range to meet demands. As the market changes, so do they!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 13:44:13

No Duplicates.

**Comment 331 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lori

Last Name: Ballance

Email Address: lballance@gdandb.com

Affiliation: John Wayne Airport

Subject: Comments on the Proposed Scoping Plan (October 2008)

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1379-comment\\_ltr\\_on\\_ab\\_32\\_proposed\\_scoping\\_plan\\_\\_12-8-08\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/1379-comment_ltr_on_ab_32_proposed_scoping_plan__12-8-08_.pdf)

Original File Name: Comment Ltr on AB 32 Proposed Scoping Plan (12-8-08).pdf

Date and Time Comment Was Submitted: 2008-12-08 13:53:21

No Duplicates.



**Comment 332 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Balgenorth

Email Address: bob@sbctc.org

Affiliation: State Building & Constr. Trades Cncl.

Subject: Comment on the AB 32 Proposed Scoping Plan

Comment:

Please see the attached file containing our comments on the AB 32 Proposed Scoping Plan.

Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1383-mary\\_nichols\\_chair\\_carb\\_ab\\_32\\_comments.docx](http://www.arb.ca.gov/lists/scopingpln08/1383-mary_nichols_chair_carb_ab_32_comments.docx)

Original File Name: Mary Nichols Chair CARB AB 32 Comments.docx

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

No Duplicates.

**Comment 333 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Cara

Last Name: Martinson

Email Address: cmartinson@counties.org

Affiliation:

Subject: CSAC Comment Ltr on ARB Scoping Plan Oct. 2008

Comment:

Attached is the CSAC comment letter on the proposed scoping plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1386-csac\\_20draft\\_20scoping\\_20plan\\_20comments\\_20\\_11-18\\_all\\_20edits\\_final\\_12-7.pdf](http://www.arb.ca.gov/lists/scopingpln08/1386-csac_20draft_20scoping_20plan_20comments_20_11-18_all_20edits_final_12-7.pdf)

Original File Name: CSAC%20Draft%20Scoping%20Plan%20Comments%20\_11-18\_ALL%20EDITS\_FINAL\_12-7.pdf

Date and Time Comment Was Submitted: 2008-12-08 14:32:46

No Duplicates.

**Comment 334 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Harry  
Last Name: Crowell  
Email Address: harryc@inscodico.com  
Affiliation: homebuilder

Subject: AB 32  
Comment:

Please do not add this unnecessary and ill conceived law. Homes are built to the latest standards and efficiency. Costs are already too high for most people to buy a new or used home. Please do not add more unnecessary and ill conceived additional costs for the consumer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 14:37:14

No Duplicates.

**Comment 335 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Russell

Last Name: Erickson

Email Address: russpat@comcast.net

Affiliation: retired physician, grandparent

Subject: Global warming and need to lower CO2, methane. etc.

Comment:

When deciding on new emission levels, for the sake of future generations, there is no greater good than dropping mankind's pollution of the earth with CO2, methane, and numerous chemicals. Though many refuse to confront it, we could be building to the ultimate destruction of civilization as we know and wish to maintain it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 14:41:32

No Duplicates.

## **Comment 336 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: susan

Last Name: scott

Email Address: syscott@prodigy.net

Affiliation: Environmental Forum of Marin

Subject: AB 32 Scoping Plan

Comment:

I coordinate the Land Use Day class for the Environmental Forum of Marin and write to urge you to vote for the highest possible target for development when you vote on the AB 32 Scoping Plan. Land use is the key to cutting environmental degradation and carbon emissions, and higher-density, transit-based projects make for a better quality of life for everyone. California needs to reverse development as usual and serve as the leader for land use policy. It's up to you to resist the negative pressure of the development industry and persuade them that building sustainable communities is the future for which we should all be striving.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 14:52:25

No Duplicates.

## **Comment 337 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Carolyn

Last Name: Chase

Email Address: cdchase@movesandiego.org

Affiliation: Move San Diego

Subject: Attorney General Comments on Smart Growth in San Diego

Comment:

Attorney General Edmund G. Brown Jr submitted comments on the Environmental Impact Report for the Regional Transportation Plan for the San Diego region. In the comment letter dated November 29, 2007, it stated, "The RTP will significantly increase GHG emissions at the same time that the state has mandated reducing those emissions significantly." and "...the Smart Growth Concept Map includes a large number of areas (193) that are widely dispersed in suburban and rural areas. Many of these areas are not near employment centers and not in areas that can be efficiently served by regional transit (See Independent Transit Planning Review ITPR).

and "predicted growth pattern ...seems to be focused on developable land rather than access to transit or employment."

The letter includes other examples of where the region disregarded the insights and recommendations of the ITPR to improve transit planning that would reduce VMT.

We submit these comments into the CARB process so as to bring to light the importance of requiring existing RTPs and especially transit plans, to change in order to reduce VMTs and GHGs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 15:17:06

No Duplicates.

**Comment 338 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Linda  
Last Name: Krop  
Email Address: LKrop@EDCnet.org  
Affiliation: Environmental Defense Center

Subject: AB 32 Scoping Plan  
Comment:

Please see attached comment letter. Also, please be aware that the web link published in the Notice is incorrect.  
Thank you,  
Linda Krop, Chief Counsel  
Environmental Defense Center

Attachment: [www.arb.ca.gov/lists/scopingpln08/1397-edc\\_comments\\_on\\_ab\\_32\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1397-edc_comments_on_ab_32_proposed_scoping_plan.pdf)

Original File Name: EDC comments on AB 32 Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-08 15:34:30

No Duplicates.

## **Comment 339 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ethan

Last Name: Turner

Email Address: eaturner@rocketmail.com

Affiliation:

Subject: Land Use

Comment:

I live in a rural community that has been assaulted in the last several years by commuter based development. We are about 40 miles from down town Sacramento in Amador County and the traditional scheme of development which balances how far people are willing to drive v. how much people are willing to pay has driven a great deal of growth up here.

Senate Bill 375 will have no affect on our planning and all enforcement on real estate development up here has to come from AB 32.

Currently a Bay Area Development firm owns nearly 20,000 acres of land in two separate locations in our community. They have already built one golf course community which is now riddled with foreclosures and plan to build another. They have not stated what they are going to do with the other 15,000 they own that borders Sacramento County, but I have a pretty good idea: subdivisions for commuters who will drive 80 miles round trip every day.

PLEASE WHEN CONSIDERING YOUR REGULATIONS REGARDING LAND USE, THINK OF THE RURAL COMMUNITIES WHO NEED YOUR PROTECTION. Without more stringent enforcement of Greenhouse gas emissions standards, as housing prices fall, and since gas prices have dropped, there will be more and more urban sprawl, more driving, and more green house gases.

Thanks for your time and attention.

-Ethan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 16:02:43

No Duplicates.



## **Comment 340 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: MILPITAS CHAMBER OF  
Last Name: Frank J. De Smidt  
Email Address: government@milpitaschamber.com  
Affiliation: Milpitas Chamber of Commerce

Subject: COSTLY AB32 SCOPING PLAN  
Comment:

Ms. Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Dear Ms. Nichols:

Our organization, the Milpitas Chamber of Commerce supports a balanced, cost-effective plan to reduce greenhouse gas emissions, but we are very concerned about the cost of the Board's proposed AB 32 scoping plan.

Currently, California is suffering an economic downturn with high mortgage foreclosures, rising business costs and thousands of lost jobs. In addition, the Legislature and the Governor are contemplating additional tax measures that will raise fuel costs and further burden our economy. Our industry simply cannot afford additional costs for the companies that do business here and the families that live here.

We are not comforted by your staff's rosy conclusion that the AB 32 scoping plan - the most ambitious regulatory plan ever proposed -- won't cost a penny to implement. We have been briefed about the increased energy and fuel costs that the proposed AB 32 scoping plan will impose. In particular we are concerned about the higher taxes and fees, higher electricity and natural gas costs, higher fuel costs, higher building and home costs, and higher vehicle costs the AB 32 plan will impose. Make no mistake, these increased costs will make a very bad situation much worse for our industry.

We believe it is vitally important that the Board understand and acknowledge the true costs of the Scoping Plan. For this reason, we are requesting a more accurate assessment of the potential costs of the Scoping Plan to support the Board's decision-making now and into the future

In addition, we urge your agency to use lower cost strategies to pursue greenhouse gas emission reductions. Specifically, CARB should place higher priority on evaluating the relative cost of alternative approaches to achieving AB 32 emission reduction targets. In particular, research should focus on quantifying how more reliance on cap-and-trade and offset programs could reduce the costs of implementing AB 32.

If you have any questions or need further information, please feel

free to contact us.

Sincerely,

Frank J. De Smidt  
Chairman: Government Affairs Committee  
Milpitas Chamber of Commerce  
828 N. Hillview Dr.  
Milpitas CA 95035  
408-262-2613  
408-262-2823 fax  
government@milpitaschamber.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 16:06:46

No Duplicates.

**Comment 341 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sherman

Last Name: Lewis

Email Address: cseghers@arb.ca.gov

Affiliation: Hayward Area Planning Association

Subject: Public Subsidies for Parking Structures

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1404-12\\_8\\_08\\_haywardareaplanningassoc.pdf](http://www.arb.ca.gov/lists/scopingpln08/1404-12_8_08_haywardareaplanningassoc.pdf)

Original File Name: 12\_8\_08\_Haywardareaplanningassoc.pdf

Date and Time Comment Was Submitted: 2008-12-08 16:07:35

No Duplicates.

## Comment 342 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Ryan

Last Name: Thomas

Email Address: Non-web submitted comment

Affiliation:

Subject: Form Letter- Strengthen the proposed scoping plan for AB 32 [scopingpln08]

Comment:

Please see attached zip file to view form letters received.

California Air Resources Board

Attn: scopingpln08

1001 "I" Street, P.O. Box 2815

Sacramento, CA 95812

Dear California Air Resources Board members,

I commend the California Air Resources Board staff for developing a strong proposed scoping plan for the Global Warming Solutions Act (AB 32), but urge you to further strengthen the plan to ensure that California's environment and economy are protected for future generations.

Specifically, I urge you to improve the following aspects of the plan before it is adopted in December:

\*\* While the draft plan calls for a better regional planning approach and would give people more choices to get out of their cars, the board should further increase the global warming pollution reduction target for land use to allow California to realize the full benefits of better transportation and land use planning;

\*\* Additional regulations for the industrial sector, particularly for refineries, should be included as a critical element of the plan to ensure basic health protections in our communities;

\*\* Policies to address the forest sector should be scientifically proven to reduce global warming pollution and should also address end-use consumption of wood products, as decomposition of wood products is the fastest growing area of emissions in this sector.

\*\* In order to ensure actual pollution reductions through the state, offsets, if they are allowed, must be severely limited to a very minor portion of the emission reductions to be achieved by each polluter. Polluters also must be held responsible and pay for their emissions through an auction, and the funds collected must be used to invest in clean energy solutions and further pollution reductions.

The Global Warming Solutions Act is a continuing example of California's leadership. I urge you to incorporate the above

improvements into the scoping plan before its final adoption on December 11th to ensure that California will create a clean energy economy, spurring innovation, investment, job creation and economic growth.

Sincerely,

Ryan Thomas  
22216 Victory Blvd #C209  
Woodland Hills, CA 91367

Attachment: [www.arb.ca.gov/lists/scopingpln08/1406-strenthgen\\_the\\_psp\\_\\_to\\_barcu\\_20081119.eml.zip](http://www.arb.ca.gov/lists/scopingpln08/1406-strenthgen_the_psp__to_barcu_20081119.eml.zip)

Original File Name: Strenthgen the PSP (to BARCU)20081119.eml.zip

Date and Time Comment Was Submitted: 2008-12-08 16:19:48

785 Duplicates.

**Comment 343 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation:

Subject: Comments on the Proposed Scoping Plan

Comment:

Attached are CCEEB's comments re the Proposed Scoping Plan

Attachment: [www.arb.ca.gov/lists/scopingpln08/1410-cceeb\\_comments\\_re\\_the\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1410-cceeb_comments_re_the_proposed_scoping_plan.pdf)

Original File Name: CCEEB Comments re the Proposed Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-08 16:56:16

No Duplicates.

## **Comment 344 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Cervero

Email Address: robertc@berkeley.edu

Affiliation: University of California at Berkeley

Subject: Role of land-use management in scoping plan

Comment:

Dear CARB officials:

I am writing to urge the strong consideration of land-use planning and management as an effective tool to reduce VMT per capita and thus contribute to California's climate stabilization targets. I write this based on many years of experience as a researcher at UC Berkeley studying these admittedly complex relationships.

I'll make two key points. (1) Historically, relationships between travel behavior and land use have been distorted due to underpricing and resource misallocations -- e.g., free parking, failure to price externalities, lack of congestion tolls. In Europe and elsewhere where fuel and parking charges more closely reflect true social costs, relationships between urban form and VMT are much stronger. Thus combining strategies like Transit Oriented Development (TOD) with something more akin to social-cost pricing would reveal that land-use management can play a much more significant role in reducing CO2 emissions than historically assumed. Any scoping plan needs to consider this. (2) Our understanding of the elasticities between variables like urban densities and VMT per capita are based on the low end of the curve.

As pressures like rising fuel prices (over the long term) prompt densities to increase, we will be at different places on the demand curve. These relationships are historically non-linear. I believe at more intermediate levels of prices for fuel and automobile usage, we will find the influences of factors like urban densities on transit usage and VMT reductions to be proportionally greater. Past empirical studies fail to reflect this.

I have attached a recent study I directed that examines the influences of density, accessibility, and other factors on VMT per capita based on experiences across 370 US urbanized areas in the early 2000s. The key point is that urban densities significantly drive down VMT per capita however this benefit can be neutralized whenever road densities are high. In short, synergistic benefits accrue when compact, mixed-use development is accompanied by more investments in public transit than in roads. Again, the synergies from land-use management and "smart transportation" investments, I believe, are potentially enormous, and this should be reflected in CARB's draft Scoping Plan.

Respectfully submitted,  
Robert Cervero, Professor  
Department of City and Regional Planning  
University of California, Berkeley

Attachment: [www.arb.ca.gov/lists/scopingpln08/1413-vmt\\_study-cervero\\_\\_\\_murakami.pdf](http://www.arb.ca.gov/lists/scopingpln08/1413-vmt_study-cervero___murakami.pdf)

Original File Name: VMT study-Cervero & Murakami.pdf

Date and Time Comment Was Submitted: 2008-12-08 17:18:39

No Duplicates.



**Comment 345 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Linda

Last Name: Weiner

Email Address: linwiner@earthlink.net

Affiliation: American Lung Association of California

Subject: Support Scoping Plan with Recommendations

Comment:

Attached find a letter with comments and logos from 16 statewide and regional health and medical organizations supporting the AB 32 scoping plan, and asking for specific strengthening changes to boost public health benefits to both individuals and communities throughout California.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1419-hnca\\_comments\\_final\\_dec\\_\\_2008.doc](http://www.arb.ca.gov/lists/scopingpln08/1419-hnca_comments_final_dec__2008.doc)

Original File Name: HNCA Comments Final Dec 2008.doc

Date and Time Comment Was Submitted: 2008-12-08 18:39:34

No Duplicates.

**Comment 346 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ken

Last Name: Johnson

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

Affiliation:

Subject: ARB Counsel Jenne's statement at the November 21, 2008 Board meeting

Comment:

Please see the attached document.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1422-psp\\_comments2\\_kenjohnson.pdf](http://www.arb.ca.gov/lists/scopingpln08/1422-psp_comments2_kenjohnson.pdf)

Original File Name: PSP\_Comments2\_KenJohnson.pdf

Date and Time Comment Was Submitted: 2008-12-08 20:33:26

No Duplicates.

**Comment 347 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Debbie

Last Name: Webster

Email Address: eofficer@cvcwa.org

Affiliation: Central Valley Clean Water Association

Subject: CVCWA Comments on ARB Scoping Plan

Comment:

See Attached letter

Attachment: [www.arb.ca.gov/lists/scopingpln08/1427-arb\\_scoping\\_plan\\_12-08-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1427-arb_scoping_plan_12-08-08.pdf)

Original File Name: ARB Scoping Plan 12-08-08.pdf

Date and Time Comment Was Submitted: 2008-12-08 21:36:46

No Duplicates.

## **Comment 348 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lewis

Last Name: Wolfgang

Email Address: wolfgang@sweet-haven.com

Affiliation:

Subject: Honesty over Hysteria

Comment:

I'm concerned that higher emission reduction targets for the land use sector will place an undue burden on the citizens of California. Contrary to the current hysteria surrounding the issue of anthropomorphic global warming, I and many others are convinced that warming, if it exists, is driven by natural factors. Global temperatures peaked in 1998 and have actually declined in recent years in the face of increasing CO2 levels.

Granted, many efforts taken to thwart perceived global warming are beneficial to our environment on their own merits, but the people of California will be better served by honesty, not hysteria. I urge the Board to disapprove the plan to reduce greenhouse gas emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 22:46:49

No Duplicates.

## **Comment 349 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Nell  
Last Name: Langford  
Email Address: drnell@thegrid.net  
Affiliation: Safe Beach Now

Subject: Global warming  
Comment:

We need to reduce the causes of global warming. Why is California supporting the off-highway vehicle industry? The Off-Highway Vehicle Division of State Parks and Recreation is supported by our gasoline tax on the theory that off-road vehicles don't use the roads...but they are hauled on roads. Also the legislature found the amount the OHV gets is over estimated by 50%. Who has the CO2 stats on OHV?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-08 23:30:11

No Duplicates.

**Comment 350 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Clare  
Last Name: Breidenich  
Email Address: [clare@wptf.org](mailto:clare@wptf.org)  
Affiliation: Western Power Trading Forum

Subject: Comments on Final Scoping Plan  
Comment:

Attached please find comments of the Western Power Trading Forum on the Proposed Scoping Plan.

Thank you,  
Clare Breidenich

Attachment: [www.arb.ca.gov/lists/scopingpln08/1434-12-10-08\\_wptf\\_comments\\_on\\_arb\\_final\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1434-12-10-08_wptf_comments_on_arb_final_scoping_plan.pdf)

Original File Name: 12-10-08 WPTF comments on ARB final scoping plan.pdf

Date and Time Comment Was Submitted: 2008-12-09 03:14:40

No Duplicates.

**Comment 351 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lawrence  
Last Name: Landman  
Email Address: lbl@interagan.com  
Affiliation:

Subject: Trains deliver the goods.  
Comment:

The attached submission, Trains Deliver the Goods, is published at  
35 Ecology L. Currents 139 (2008)and  
Available at: <http://www.boalt.org/elq/index.php>

Attachment: [www.arb.ca.gov/lists/scopingpln08/1435-trains\\_deliver\\_the\\_goods.pdf](http://www.arb.ca.gov/lists/scopingpln08/1435-trains_deliver_the_goods.pdf)

Original File Name: Trains Deliver the Goods.pdf

Date and Time Comment Was Submitted: 2008-12-09 04:18:21

No Duplicates.

## **Comment 352 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mary

Last Name: Vincent

Email Address: marybvincent@gmail.com

Affiliation:

**Subject: Animal Agriculture Causes More Greenhouse Gases Than Transportation  
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 06:53:31

No Duplicates.



**Comment 353 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: George

Last Name: Larson

Email Address: glarson@geosoils.com

Affiliation:

Subject: AB 32

Comment:

Our state is sinking in the financial quicksand of well intended, but impossible to implement legislation. Be careful! We may not survive our present problems, let alone those that are crafted by AB 32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 08:06:25

No Duplicates.

## **Comment 354 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Karen  
Last Name: Eggerman  
Email Address: eggermank@yahoo.com  
Affiliation: California Voter

Subject: AB32 Land Use Targets  
Comment:

Dear CARB Members,

I appreciate your hard work in preparing the AB32 Scoping Plan. This is such an important plan for all current and future Californians because it will shape our economy and society. It will inspire other entities around the nation and the world.

I strongly urge you to demonstrate that Californians can make tough decisions to meet the challenge of global warming in the face of difficult economic conditions. Take bold action. Set the stage for us to grow our communities in a manner that is responsible to current and future generations and our environment. Raise the land use target in the AB32 Scoping Plan to 14 MMT of CO2 equivalent.

Setting this more aggressive, yet achievable target says that land use patterns are critical in reducing global warming. Committing financial resources, technical assistance, and support to local and regional governments and transportation agencies assures meeting a higher target and provides an economic stimulus. Our President-Elect considers an investment in infrastructure a means of employing people and recharging our economy.

Inspire us to innovate. Raise the land use target now.

Respectfully,

Karen Eggerman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 08:58:58

No Duplicates.

## **Comment 355 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: anne

Last Name: ingalls

Email Address: aingalls55@hotmail.com

Affiliation:

Subject: AB 32

Comment:

Please show courage and leadership and set high goals for reducing annual greenhouse gas emissions. Begin this by changing the fundamentals of how our communities grow. Take the leadership role by setting a higher target for the land use sector. This will show others looking to California that land use patterns are a high priority in battling global warming. Bolster this with a commitment to provide financial resources, technical assistance to support all parts of government: local, transportation and regional. Please take the leadership role.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 09:27:29

No Duplicates.

**Comment 356 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dorothy

Last Name: Roadman

Email Address: [droadman@ci.american-canyon.ca.us](mailto:droadman@ci.american-canyon.ca.us)

Affiliation: City of American Canyon

Subject: Scoping Plan

Comment:

This is being sent by Dorothy Roadman, City of American Canyon City Clerk, for Mayor Leon Garcia - Mayor, City of American Canyon.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1446-ab\\_32\\_scoping\\_plan\\_letter\\_dec08-rev\\_sc\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/1446-ab_32_scoping_plan_letter_dec08-rev_sc__2_.pdf)

Original File Name: AB 32 Scoping Plan Letter dec08-rev sc (2).pdf

Date and Time Comment Was Submitted: 2008-12-09 10:05:38

No Duplicates.

**Comment 357 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: leslie  
Last Name: wood  
Email Address: leyore@aol.com  
Affiliation: none

Subject: AB 32 Scoping Plan  
Comment:

Please set a high target for the land use sector as regards greenhouse gas reductions in your upcoming meeting. Also, please consider providing resources and technical assistance so that these targets can be achieved. As a technological and cultural leader, our state should be at the forefront of these reforms.

Sincerely,  
Leslie Wood  
St. Helena, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 10:33:16

No Duplicates.

**Comment 358 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Randal

Last Name: Friedman

Email Address: Randal.Friedman@navy.mil

Affiliation:

Subject: DoD SCOPING PLAN COMMENTS

Comment:

Attached please find DoD's second comment letter on the AB 32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1451-dod\\_scoping\\_plan\\_ltr\\_9dec08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1451-dod_scoping_plan_ltr_9dec08.pdf)

Original File Name: DoD Scoping Plan ltr 9Dec08.PDF

Date and Time Comment Was Submitted: 2008-12-09 10:42:57

No Duplicates.

## **Comment 359 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert E.  
Last Name: Rutkowski  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Re: CARB Scoping Plan Final Comments  
Comment:

Re: CARB Scoping Plan Final Comments

Dear Chair:

Thank you for you and your staff's hard work on the Climate Change Scoping Plan. Your plan will shape the state's response to global warming over several decades.

As you meet Dec. 11-12 to consider whether to adopt the plan, I hope you take the time to review three key areas: land use, auctions, and offsets.

Land Use: Please consider setting a higher target for land use pollution reduction, since the low target included in the current version will not help the state to achieve its longer-range 2050 goal for reducing the pollution that causes global warming. But changing land-use practices now will reduce sprawl, preserve pollution-absorbing open space, and provide a net economic benefit to our state.

Auctions: Please consider requiring auctions not giveaways for any and all carbon allowances granted by CARB. Not only does auctioning promote polluter accountability and encourage faster reductions of emissions, but the auction system also would provide revenue for important goals that CARB shares with the environmental community, such as providing better transit, green jobs and help for low-income areas.

Offsets: Please think about reducing the offsets allowed under this plan. Under the current plan, polluters could rely entirely on offsets in the early years of the program, thus allowing polluters in capped sectors to delay making their own emission reductions until later years, in some cases not until 2018.

Thank you for the strong leadership you have provided and continue to provide as California addresses the pollution that causes global warming.

Yours sincerely,  
Robert E. Rutkowski

cc:  
House Leadership

2527 Faxon Court  
Topeka, Kansas 66605-2086  
P/F: 1 785 379-9671  
E-mail: rutkowski@terraworld.net

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 10:55:28

No Duplicates.



**Comment 360 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ruth

Last Name: McCormick

Email Address: [rmccormick@bcse.org](mailto:rmccormick@bcse.org)

Affiliation: Business Council for Sustainable Energy

Subject: BCSE Comments on Scoping Plan

Comment:

Please see the attached comments from the Business Council for Sustainable Energy (BCSE) regarding the California Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1456-bcse\\_ca\\_ab32\\_fnldec08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1456-bcse_ca_ab32_fnldec08.pdf)

Original File Name: BCSE CA AB32 FNLDec08.pdf

Date and Time Comment Was Submitted: 2008-12-09 11:18:20

No Duplicates.

**Comment 361 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: David

Last Name: Ligh

Email Address: david.ligh@exxonmobil.com

Affiliation: Exxon Mobil Corporation

Subject: ExxonMobil's Comments to AB 32 Scoping Plan

Comment:

Please see attached file containing ExxonMobil's comments to the AB 32 Scoping Plan. If you have any problems receiving or opening the file, please contact Stephanie Pill at (916) 444-7858. Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1457-em\\_comment\\_to\\_carb\\_dec\\_9\\_2008\\_final.pdf](http://www.arb.ca.gov/lists/scopingpln08/1457-em_comment_to_carb_dec_9_2008_final.pdf)

Original File Name: EM comment to CARB Dec 9 2008 final.pdf

Date and Time Comment Was Submitted: 2008-12-09 11:19:59

No Duplicates.

**Comment 362 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Derek

Last Name: Walker

Email Address: dbwalker@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF supports plan adoption with increased land use targets

Comment:

Please find attached our comments supporting adoption of the Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1460-env.\\_defense\\_fund\\_ab\\_32\\_scoping\\_plan\\_comment.pdf](http://www.arb.ca.gov/lists/scopingpln08/1460-env._defense_fund_ab_32_scoping_plan_comment.pdf)

Original File Name: Env. Defense Fund AB 32 Scoping Plan Comment.pdf

Date and Time Comment Was Submitted: 2008-12-09 11:48:12

No Duplicates.

## **Comment 363 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Derek

Last Name: Walker

Email Address: dbwalker@edf.org

Affiliation:

Subject: EDF comments, supporting documents

Comment:

Please find attached three documents to support our comments on the Proposed Scoping Plan:

1. M.Cubed Jobs Study
2. Aspen Environmental Economic Modeling Study
3. Climate for Community Concept Brochure

Attachment: [www.arb.ca.gov/lists/scopingpln08/1461-edfreports.zip](http://www.arb.ca.gov/lists/scopingpln08/1461-edfreports.zip)

Original File Name: EDFreports.zip

Date and Time Comment Was Submitted: 2008-12-09 11:57:52

No Duplicates.

**Comment 364 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: William

Last Name: Rostov

Email Address: [wrostov@earthjustice.org](mailto:wrostov@earthjustice.org)

Affiliation: Earthjustice

Subject: Proposed Scoping Plan Comments

Comment:

Comment letter and three attachments

Attachment: [www.arb.ca.gov/lists/scopingpln08/1462-ej\\_comments\\_on\\_ab\\_32\\_scoping\\_plan\\_12\\_09\\_08\\_final.zip](http://www.arb.ca.gov/lists/scopingpln08/1462-ej_comments_on_ab_32_scoping_plan_12_09_08_final.zip)

Original File Name: EJ comments on AB 32 scoping plan 12 09 08 Final.zip

Date and Time Comment Was Submitted: 2008-12-09 12:06:08

No Duplicates.

## **Comment 365 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: SUSAN  
Last Name: HARVEY  
Email Address: IFSUSAN@TCSN.NET  
Affiliation:

Subject: AB Scoping - Land Use Sector  
Comment:

Chairwoman Mary D. Nichols

Honorable Chairwoman Nichols,

I am the President of North County Watch a 501c3 organization in San Luis Obispo County. We are an all volunteer organization advocating for sustainable land use policy.

The issue of Vehicles Miles Traveled is dear to our heart. Dreadful, sprawling low density subdivisions are being regularly applied for and approved in San Luis Obispo County. Our county is over 3,000 square miles - primarily agriculture and rural - plenty of land to be inappropriately gobbled up by sprawling mini ranchette subdivisions.

Our NCW Board strongly urge you and the Board to adopt the most stringent CO2 standards for land use. Please give our local APCD all the tools it needs to positively effect changes in local land use approvals. Declining air quality standards caused by mobile sources directly affect our local businesses, as they then are required to compensate for declining air quality.

CARB should raise the land use target in AB 32 Scoping Plan from 5 million metric tons of CO2 equivalent (MMT) to 11-14 MMT.

Thank you and your Board for your consideration of our request.

Susan Harvey  
President  
North County Watch  
P.O. Box 455  
Templeton, CA 93465

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 12:07:35

No Duplicates.

## **Comment 366 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kendra

Last Name: Gonzales

Email Address: earthworks\_works@yahoo.com

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

Please do not bow to pressures from those whose priorities are making money over saving the planet. There should not be any hesitation to pursue the most rigorous plan(s) to reduce greenhouse gas emissions considering the absolutely DIRE consequences we now face.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 12:57:45

No Duplicates.

**Comment 367 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lori

Last Name: Pedersen

Email Address: lpedersen@SantaBarbaraCA.gov

Affiliation: City of Santa Barbara

Subject: City of Santa Barbara Comments on CARB Proposed Scoping Plan

Comment:

Please see attached letter for the City of Santa Barbara's comments on the Climate Change Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1466-20081209\\_-\\_carb\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/1466-20081209_-_carb_letter.pdf)

Original File Name: 20081209 - CARB Letter.pdf

Date and Time Comment Was Submitted: 2008-12-09 13:10:44

No Duplicates.



**Comment 368 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Laura

Last Name: Tam

Email Address: ltam@spur.org

Affiliation: SPUR

Subject: Comments on Proposed Scoping Plan

Comment:

Please see attachment reflecting SPUR's comments on the AB32  
Proposed Scoping Plan.  
Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1468-spur\\_comments\\_on\\_psp\\_12-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1468-spur_comments_on_psp_12-08.pdf)

Original File Name: SPUR comments on PSP 12-08.pdf

Date and Time Comment Was Submitted: 2008-12-09 13:12:49

No Duplicates.

## **Comment 369 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Greg

Last Name: Karras

Email Address: gkarras@cbeval.org

Affiliation: Communities for a Better Environment (CB

Subject: Supplemental comment on AB32 Scoping Plan; Increasing GHG emissions from dirty crude

Comment:

An accelerating switch to lower quality crude oil input has already increased California refinery GHG emissions by 3 million tonnes CO<sub>2</sub>eq/year, and by 2020 could further increase emissions by another 8-13 million tonnes/year, from hydrogen steam reforming alone. Inherently dirtier feedstock threatens to cause total emissions from transportation fuel production that worsen toxic pollution near refineries, and might overwhelm climate protection efforts.

A just-completed analysis documenting these points is attached. This evidence further supports CBE's comments on the Scoping Plan, and supplements our comments submitted yesterday. References cited in the attached cover letter were submitted today separately.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1474-cbe-arb120808supplement.pdf](http://www.arb.ca.gov/lists/scopingpln08/1474-cbe-arb120808supplement.pdf)

Original File Name: CBE-ARB120808Supplement.pdf

Date and Time Comment Was Submitted: 2008-12-09 15:17:05

No Duplicates.

**Comment 370 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Scott

Last Name: Kruse

Email Address: s\_kruse@me.com

Affiliation: Biophysical Geographer

Subject: AB32 - CA Greenhouse Emissions

Comment:

Emphasize conservation and efficiency in transportation & housing. Place the tightest restrictions possible on vehicles, especially diesel, including trucks and buses. Rapidly phase out older vehicles, especially diesel. Eliminate engines that idle at stops (hybrids, electrics do best). Support the coming plug-in hybrid vehicles (PHEVs) and electric high speed rail. Send the strongest signal that walking & bicycle routes, electric light rail are an integral positive part of every community. Every community must emphasize compactness, infilling, conservation & energy efficiency.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 15:37:30

No Duplicates.

## **Comment 371 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jan & Bob  
Last Name: Mountjoy  
Email Address: jmtjoy@com-pair.net  
Affiliation: Rural resident

Subject: AB 32 Scoping Plan to Reduce Greenhouse Gas Emissions in California  
Comment:

Dear Members of the Board,

It is of great concern to us that the CEPA ARB take positive action in your upcoming meeting this Thursday to increase the setting of the land use target to a meaningful reduction of air pollution in California. California has led the nation and most of the world in promoting standards that set a high priority in the fight against global warming.

A strong and adequate commitment must also be made to provide financial resources, technical assistance, and other support to help regions, local governments, and transportation agencies achieve the target.

The recent reduction in the use of auto fuel shows that Americans can adjust and make an effort to do their personal share in protecting our environment. The time to act in now.

Sincerely,  
Bob and Jan Mountjoy  
Hayfork, Ca (the mountains of rural northern California)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 16:18:03

No Duplicates.

## **Comment 372 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ann

Last Name: Lindsay MD

Email Address: alindsay@co.humboldt.ca.us

Affiliation:

Subject: Scoping plan and land use reform

Comment:

I urge you to set a higher emission reduction starget for the land use sector. Growth can be directed to cut greenhouse gas emissions and lower vehicle miles traveled by focusing growth in previously developed land such that people are closer to jobs, schools, stores and services and will be more likely to drive less and walk or bike more. A Health Impact Assment performed on the three density options proposed for the Humboldt County General Plan update showed that in 25 years the infill option would result in 400,000,000 less vehicle miles traveled compared to the option allowing significant development in previously undeveloped land. The sprawl option would result in a 25% increase in the baseline vehicle miles traveled. Without higher targets for reduction of carbon emissions by land use, California will have a difficult time meeting the Governor's targets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 17:00:48

No Duplicates.

## **Comment 373 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Brian

Last Name: Knittel

Email Address: BrianKnittel@Yahoo.com

Affiliation:

Subject: Please make land use a priority

Comment:

On November 22nd, our Cool Cities campaign convened a workshop in conjunction with Greenbelt Alliance and the Planning and Conservation League. A key message of that workshop was that land use planning is critical to our success in the fight against global warming.

The best way for CARB to help build climate-friendly communities is to pass a larger emission reduction target for the land use sector in the AB-32 Scoping Plan. A higher target means that growth will be directed in ways that cut greenhouse gas emissions by lowering vehicle miles traveled, increasing opportunities for walking and biking, and making transit accessible for more people.

The Board members meet on Thursday morning to approve the Scoping Plan and make any final changes. It looks like it will be a very close vote. Make your voice count by sending the enclosed letter to CARB and letting them know that land use reform is an important tool in the solution to climate change!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 17:26:13

No Duplicates.

## **Comment 374 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jordan

Last Name: Lang

Email Address: langvors@ix.netcom.com

Affiliation: none

Subject: Climate Change Scoping Plan

Comment:

Dear ARB: I'm concerned that your plan is missing an important opportunity to harness the power of consumers and markets by relying so heavily on bureaucratic decisionmaking. I believe a much simpler and efficient way to achieve the carbon reductions and energy efficiencies that we all want is by immediately setting a carbon tax (on the hundreds of suppliers introducing carbon fuels into our economy, rather than on the thousands of carbon-pollution emitters). This tax will cause the prices of carbon based fuels to increase with the harshest effects on low- and middle-income households. Therefore, coupled to the tax must be a provision to immediately, equally, and directly return the revenues collected from the tax to those households, with several immediate and beneficial effects: 1) mitigating the regressive effect of higher fuel prices, 2) putting dollars in the hands of those families most likely to spend them immediately and thereby boost our stagnant economy, and 3) providing funds for more strongly incentivized consumer spending for efficient vehicles and other energy technologies.

I fear that the approach laid out in your plan will take years to design and implement because it has so many decisions that need to be made with input from so many stakeholders. Instead, let's make it quick and simple: 1) send a strong price signal to consumers to move away from carbon-based fuels, and 2) give those consumers the ability to select in the marketplace new, efficient, and noncarbon based technologies (e.g. autos, mass transit, foods, packaging materials, etc. etc.).

Thanks for your efforts. Please see [www.capanddividend.org](http://www.capanddividend.org) for info about how such measures can work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 17:28:48

No Duplicates.

## **Comment 375 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Bill

Last Name: Leikam

Email Address: billl5@prodigy.net

Affiliation:

Subject: A Greener California

Comment:

On November 22nd, our Cool Cities campaign convened a workshop in conjunction with Greenbelt Alliance and the Planning and Conservation League. A key message of that workshop was that land use planning is critical to our success in the fight against global warming.

The best way for CARB to help build climate-friendly communities is to pass a larger emission reduction target for the land use sector in the AB-32 Scoping Plan. A higher target means that growth will be directed in ways that cut greenhouse gas emissions by lowering vehicle miles traveled, increasing opportunities for walking and biking, and making transit accessible for more people.

The Board members meet on Thursday morning to approve the Scoping Plan and make any final changes. It looks like it will be a very close vote. Make your voice count by sending the enclosed letter to CARB and letting them know that land use reform is an important tool in the solution to climate change!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 17:31:37

No Duplicates.



**Comment 376 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Susie

Last Name: Berlin

Email Address: sberlin@mccarthyllaw.com

Affiliation: Northern California Power Agency

Subject: Comments on Proposed Scoping Plan

Comment:

attached hereto please find the comments of the Northern California Power Agency to the October 15, 2008 Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1491-comments\\_to\\_carb\\_re\\_10-15-08\\_proposed\\_scoping\\_plan\\_\\_final\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/1491-comments_to_carb_re_10-15-08_proposed_scoping_plan__final_.pdf)

Original File Name: comments to CARB re 10-15-08 proposed scoping plan \_final\_.pdf

Date and Time Comment Was Submitted: 2008-12-09 17:40:52

No Duplicates.

**Comment 377 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jim  
Last Name: Hawley  
Email Address: [jhawley@technet.org](mailto:jhawley@technet.org)  
Affiliation: TechNet

Subject: TechNet Comments to October Draft AB 32 Scoping Plan  
Comment:

Please find enclosed TechNet's comments to the October draft of the proposed AB 32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1492-ab\\_32\\_scoping\\_plan\\_-\\_december\\_comments\\_\\_12-9\\_final\\_.pdf](http://www.arb.ca.gov/lists/scopingpln08/1492-ab_32_scoping_plan_-_december_comments__12-9_final_.pdf)

Original File Name: AB 32 Scoping Plan - December comments (12-9 final).pdf

Date and Time Comment Was Submitted: 2008-12-09 17:44:13

No Duplicates.

**Comment 378 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anna

Last Name: Lee

Email Address: alee@cbeval.org

Affiliation: CBE

Subject: CBE's comments Dec 8 AB 32 PSP 1

Comment:

This is the main comment submitted by Communities for a Better Environment. The attachments and May 8 comments are submitted after this submittal, as I couldn't attach more than one document.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1500-cbe\\_comments\\_dec\\_08\\_ab32\\_propd\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1500-cbe_comments_dec_08_ab32_propd_scoping_plan.pdf)

Original File Name: CBE comments Dec 08 AB32 Propd Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-09 17:53:55

No Duplicates.

**Comment 379 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anna

Last Name: Lee

Email Address: alee@cbeval.org

Affiliation: CBE

Subject: CBE's comments Dec 8 AB 32 PSP (2 of 3)

Comment:

This is the second part of Communities for a Better Environment's comments. The third is following.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1503-zipped\\_attachments\\_cbe\\_dec\\_2008\\_comments\\_on\\_prop\\_ab32\\_scoping\\_plan.zip](http://www.arb.ca.gov/lists/scopingpln08/1503-zipped_attachments_cbe_dec_2008_comments_on_prop_ab32_scoping_plan.zip)

Original File Name: zipped attachments CBE Dec 2008 comments on Prop AB32 Scoping Plan.ZIP

Date and Time Comment Was Submitted: 2008-12-09 18:00:29

No Duplicates.

**Comment 380 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anna

Last Name: Lee

Email Address: alee@cbeval.org

Affiliation: CBE

Subject: CBE's comments Dec 8 AB 32 PSP (3 of 3)

Comment:

This is the third part of Communities for a Better Environment's comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1505-attach\\_c\\_oil\\_refinery\\_sector\\_ab32\\_may\\_08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1505-attach_c_oil_refinery_sector_ab32_may_08.pdf)

Original File Name: Attach C Oil Refinery Sector AB32 May 08.pdf

Date and Time Comment Was Submitted: 2008-12-09 18:02:36

No Duplicates.

**Comment 381 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Anna

Last Name: Lee

Email Address: alee@cbeocal.org

Affiliation: CBE

Subject: Support from Env Health Coalition and Ctr on Race, Pov & the Env for CBE's comments

Comment:

Attached is a letter of support from Environmental Health Coalition and Center on Race, Poverty, & the Environment for Communities for a Better Environment's comments on the Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1508-letter\\_of\\_support\\_of\\_cbe\\_comments\\_from\\_ehc\\_and\\_crpe\\_dec\\_9\\_08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1508-letter_of_support_of_cbe_comments_from_ehc_and_crpe_dec_9_08.pdf)

Original File Name: Letter of Support of CBE comments from EHC and CRPE Dec 9 08.pdf

Date and Time Comment Was Submitted: 2008-12-09 18:08:01

No Duplicates.

## **Comment 382 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: annie

Last Name: steele

Email Address: annies@kcbx.net

Affiliation:

Subject: green house gases on California Beaches

Comment:

The ability to breath in an easy rythm is life at its best. My memory of a time when we enjoyed a different envirionmnet is clear. I could walk the beach with my dog in the early morining hours and relax. This beween 5-AM to 7:15 AM every morning. then came the invasion of ATV and motorhomes. Nothing lives on the local Pismo beach or the Oceano California beach. Nothing is there. There use to be Brown Peligans, millions of these little cray fish things on th shore, Clams our clams were famous. Trourist came from arround the world to clam on our beach. Day and night now, the invasion of ATV ans motorhomes come now never stoppong for a moment smashing everything under their wheels leaving behind tons of green house gases carbons and and beteks,The liquid gas cans slosh in the back of flat beds and they move accros our beach, leaving death in their wake . will send a second comment with pictures to illustrate my issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 19:02:15

No Duplicates.

## **Comment 383 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kay

Last Name: Martin

Email Address: kay4bioenergy@aol.com

Affiliation: BioEnergy Producers Association

Subject: AB 32 Scoping Plan

Comment:

My name is Kay Martin and I am Vice-President of the BioEnergy Producers Association.

The BioEnergy Producers Association (BPA) is a coalition of private companies and public agencies dedicated to the development and commercialization of environmentally preferable industries that produce renewable sources of power, fuels, and chemicals from agricultural, forestry and urban biomass wastes and other carbonaceous materials. Our membership includes bioenergy firms, electric utilities, and waste management companies.

The BPA has reviewed the "Recycling and Waste" section of the Climate Change Draft Scoping Plan, whose recommendation is to "increase waste diversion, composting, and commercial recycling, and move toward zero-waste." The most promising approach to achieving this goal is to use the organic portion of the post-recycled waste stream as a feedstock for the production of advanced biofuels and green power. However, the only mention of renewable energy uses is "through deployment of anaerobic digestion for production of fuels/energy."

We respectfully request CARB's consideration of additional measures for Landfill Methane Control. Landfill Methane can be controlled by disposing of carbon-based materials prior to their being landfilled, by using them as feedstocks (disposing of them) in the process of producing liquid and electric energy using clean thermochemical conversion technologies.

Specifically, the Recycling and Waste Sector Preliminary Recommendation should mirror and complement strategies outlined for the agricultural sector by encouraging the use of urban biomass wastes for sustainable energy production. Deployment of bioenergy strategies is consistent with the Bioenergy Action Plan, the Low Carbon Fuel Standard (LCFS), and AB 32 GHG reduction goals for the following reasons:

### **Landfill Abatement Potential**

The Draft Scoping Plan recognizes fugitive landfill methane gas emissions as a major GHG precursor, and calls for measures to reduce the volume of materials flowing to land disposal. Existing source reduction, recycling, and composting programs are credited with attainment of the state's 54% diversion rate (14% of which receives this credit is actually green waste that is being placed IN landfills for use as daily cover), and the Plan places principal reliance upon the expansion of these programs to reduce disposal



tonnages in the future, virtually ignoring the potential to use these waste resources in the clean production of liquid and electric energy.

Despite the success of its recycling and composting efforts, California's high disposal rate has remained virtually unchanged for the past 20 years. 40 million tons of municipal waste were landfilled in California in 1989, the year AB 939 was passed. This year, despite the progress of recycling, the state will place 40 million tons of post-recycled waste in its landfills.

It is folly to believe that this volume of post-recycled material can be eliminated through source reduction, traditional means of recycling and composting alone, on which California's waste disposal hierarchy now relies. All methods of disposal must be incorporated in any effective plan, and this includes the complete disposal (i.e., destruction) of carbon-based wastes in the process of producing the liquid and electric energy so desperately needed by the state.

The state's population is expected to grow by some 10 million people over the next 25 years. Unless more flexible legislative and regulatory policies are put in place, enabling the use of its waste resources for energy production, the state will landfill more than one billion tons (that's one billion) of municipal solid waste during that time--and a major opportunity to achieve energy independence, AB 32 GHG reduction goals and a Low Carbon Fuel Standard (LCFS) will be lost.

Approximately 70% of the residual materials placed in landfills consist of various types of biomass, only a portion of which may be feasibly composted or recycled. In short, new tools are needed. For example, compostable organics (i.e. food and vegetative wastes), comprise only about 25% of this stream. Similarly, there is no estimate of additional biomass materials, such as paper, which may be recovered through intensified commercial recycling efforts, although markets for the major portion of this stream may have already been optimized, with residuals having limited commodity market value.

In contrast, new biomass conversion technologies, such as in-vessel hydrolysis/fermentation and thermal/fermentation processes, have the potential to convert the full spectrum of landfill-bound carbonaceous waste materials into renewable energy products, including power, fuels, and chemicals. Because of their unprecedented potential to divert waste materials to beneficial use, the development of clean technology bioenergy facilities is an essential and necessary component of future landfill abatement strategies.

Although the market for the export of recycled materials to China and other foreign countries (where there are substantially no environmental controls on their processing, and where they are turned into goods to be sold back into the United States, depriving Americans of jobs), although this market has proved to be unstable, the demand for environmentally preferable advanced biofuels and green power, which can be produced domestically by Californians, is just beginning to grow.

#### GHG Reduction Potential

The Draft Scoping Plan notes that commercial recycling and

composting programs "could have substantial greenhouse gas benefits but their in-state reductions have not been quantified at this time." Indeed, data on the effectiveness of current waste management practices as climate change strategies are both inconclusive and incomplete.

Composting operations, for example, have their own set of air quality concerns, including VOCs and GHG precursors. In fact, an independent study recently completed by the Los Angeles County Sanitation Districts<sup>1</sup> concluded that placement of urban green waste in landfills as alternative daily cover was superior to composting these materials in terms of net GHG emissions.

The climate change benefits of recycling are generally assumed to derive from the avoidance of virgin material extraction and reintroduction of recovered materials with "intrinsic energy value" back into the remanufacturing process, although the Draft Scoping Plan admits that such benefits may not occur in California. Indeed, the majority of California's recyclables leave the state for distant domestic or foreign markets, with the largest volume of these commodities, namely paper and plastics, being shipped to China.

The life cycle analyses on which recycling climate change benefits are based seldom calculate the global GHG impacts of trans-Pacific shipping, or of transferring the remanufacturing burden to developing nations where environmental controls are minimal or nonexistent. These atmospheric industrial pollutants drift eastward and find their way back to California in a matter of days, contributing further to the state's GHG reduction challenge.

The CIWMB's own studies point out the critical need to both reevaluate and expand the range of technologies employed to meet future landfill abatement and climate change objectives. For example, a comprehensive life cycle analysis of waste management practices completed in 2004 by the Research Triangle Institute<sup>2</sup> concluded that new waste conversion technologies (acid hydrolysis, gasification, and catalytic cracking) were superior to recycling and composting with regard to energy balance, NO<sub>x</sub> emissions, and carbon emissions. Similarly, a 2006 study of thermal waste conversion technologies prepared for the CIWMB by UC Riverside<sup>3</sup> stated:

"If conversion technologies were able to process a significant portion of California's waste that is currently landfilled, benefits could be realized in a number of areas. These include reductions in overall greenhouse gas emissions, fugitive landfill gas emissions, and diesel truck emissions. On the energy production side, the avoided costs and impacts in exploration, production, and transportation of traditional fuels could be substantial."

This same study concluded:

"Thermochemical technologies can process a wider variety of feedstocks and can have a greater effect on landfill reduction. Thermochemical technologies can also produce a larger variety of products, which can displace the need for non-renewable sources of energy and fuels. Other indirect effects include eliminating diesel truck trips and reducing landfill gas emissions."

Thermochemical conversion technologies are clean technologies

because nothing enters the atmosphere as a result of the gasification (waste disposal) step. The resulting synthesis gases and waste heat from the processes can be converted to liquid and electric energy. The opposition to conversion technologies that is influencing legislative and administrative policy in California stems from those who refuse to accept that 21st century technology can achieve environmentally superior waste-to-energy technologies; from the traditional recycling industry which wants to suppress competition for the state's waste streams and from waste management firms that view conversion technologies as threats to landfills.

It is time for the state to look past these short-sighted positions and embrace these emerging technologies with the same commitment as the federal government, other states and nations. More than 100 of these plants are now operating or will be constructed in Europe and Asia during the next decade.

California should be a leader in encouraging such technologies. However, private enterprise will continue to take these projects elsewhere until the state adopts a practical, efficient and supportive statutory and regulatory environment for their implementation and operation.

#### Recommendation

The BioEnergy Producers Association supports the expansion of California's source reduction, recycling, and composting programs. At the same time, we urge that new clean-technology bioenergy strategies be applied to the state's growing post-recycled waste stream in order to meet urgent landfill abatement and climate change goals. Timely deployment of waste-based biorefineries can provide a vehicle for integrating California's renewable energy, AB 118, and AB32 policy objectives.

#### References:

- 1 Evaluation of Green Waste Management Impacts on GHG Emissions, Alternative Daily Cover Compared with Composting. Los Angeles County Sanitation Districts, April 2008.
- 2 Life Cycle and Market Impact Assessment of Noncombustion Waste Conversion Technologies. Prepared for the CIWMB by the Research Triangle Institute International, 2004.
- 3 Evaluation of Environmental Impacts of Thermochemical Conversion Technologies Using Municipal Solid Waste Feedstocks. Prepared for the CIWMB by the University of California , Riverside, April 2006.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 19:03:57

No Duplicates.

**Comment 384 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kirsten  
Last Name: Schwind  
Email Address: [kirsten@baylocalize.org](mailto:kirsten@baylocalize.org)  
Affiliation: Bay Localize

Subject: AB 32 Scoping Plan Comments  
Comment:

Dear CARB,

Please find Bay Localize's organizational comments on the AB 32 Scoping Plan attached.

Best,  
Kirsten Schwind

Kirsten Schwind  
Program Director  
Bay Localize  
436 14th St, Ste 1127  
Oakland, CA 94612

Attachment: [www.arb.ca.gov/lists/scopingpln08/1535-comments\\_on\\_ab\\_32\\_scoping\\_plan\\_bay\\_localize\\_final.doc](http://www.arb.ca.gov/lists/scopingpln08/1535-comments_on_ab_32_scoping_plan_bay_localize_final.doc)

Original File Name: Comments on AB 32 Scoping Plan Bay Localize Final.doc

Date and Time Comment Was Submitted: 2008-12-09 20:00:00

No Duplicates.

**Comment 385 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Marjorie Ann  
Last Name: Ottenberg  
Email Address: marjott@yahoo.com  
Affiliation: Sierra Club, Audubon,

Subject: Curtailing/reducing greenhouse gas emissions in California  
Comment:

As California's population has increased (exploded!), so has the smog! Unless we can do SOMETHING to reduce greenhouse gas emissions as well as the smog, we will soon find ourselves unable to BREATHE! Unfortunately, for many people with lung problems, asthma, etc.--it is ALREADY very difficult to breathe on many days! Last year we saw the movie "Who Killed The Electric Car?"--which helped explain the increase in smog--and also the current dire condition of the auto industry! The movie pointed out that the electric cars received little or no encouragement from the California Air Resources Board--I hope I misunderstood that; surely, encouraging electric cars and home solar electric capacity would go a LONG way toward reducing SMOG and its awful effects!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 20:41:45

No Duplicates.

**Comment 386 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Norman  
Last Name: Plotkin  
Email Address: norm@pzallc.com  
Affiliation: CIPA

Subject: CIPA Comments on the Revised Scoping Plan  
Comment:

Please find attached comments from the California Independent Petroleum Association on the revised draft scoping plan. If there are any questions regarding these comments, please feel free to contact me at 916-446-5900.

Regards,  
Norman Plotkin

Attachment: [www.arb.ca.gov/lists/scopingpln08/1543-cipa\\_revised\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/1543-cipa_revised_scoping_plan_comments.pdf)

Original File Name: CIPA Revised Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-12-09 20:59:38

No Duplicates.

**Comment 387 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Bonnie

Last Name: Knight

Email Address: Bonbonsf@aol.com

Affiliation:

Subject: Reducing greenhouse gas emissions

Comment:

Animal agriculture should be reduced in favor of plant-based agriculture. Farm animals emit methane gas. Also, the transportation of these animals contributes to emissions from trucks. If our citizens were educated to adopt a more plant-based diet, they would be healthier and the environment would be healthier, too.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 21:11:23

No Duplicates.

## **Comment 388 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: RICK

Last Name: VIERHUS

Email Address: vierhus@yahoo.com

Affiliation:

Subject: the vital need to reduce GHG in the regulations of California

Comment:

The greatest threat to the future livability of the Earth is global warming.

California has the rare opportunity change the dynamics of the global focus on global warming by reducing the levels of Greenhouse Gases. In taking important action to effect the regulation of gases emitted by the transportation sector you will alter the perception of many people about how relevant governmental efforts can be.

Do the forward looking right action and increase our possibility of a sustainable environment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 21:56:01

No Duplicates.



## **Comment 389 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lucille

Last Name: Tse

Email Address: giraffepills@yahoo.com

Affiliation:

Subject: Please include ambitious GHG emission reduction targets for land use .

Comment:

On November 22nd, our Cool Cities campaign convened a workshop in conjunction with Greenbelt Alliance and the Planning and Conservation League. A key message of that workshop was that land use planning is critical to our success in the fight against global warming.

The best way for CARB to help build climate-friendly communities is to pass a larger emission reduction target for the land use sector in the AB-32 Scoping Plan. A higher target means that growth will be directed in ways that cut greenhouse gas emissions by lowering vehicle miles traveled, increasing opportunities for walking and biking, and making transit accessible for more people.

The Board members meet on Thursday morning to approve the Scoping Plan and make any final changes. It looks like it will be a very close vote. Make your voice count by sending the enclosed letter to CARB and letting them know that land use reform is an important tool in the solution to climate change!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 22:41:59

No Duplicates.

**Comment 390 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Roger

Last Name: Sowell

Email Address: rsowell@resowell-law.com

Affiliation: Law Offices of Roger E. Sowell

Subject: Scoping Plan Base Case Flawed

Comment:

Please see the attached letter dated December 9, 2008. Thank you.

Roger E. Sowell

Attachment: [www.arb.ca.gov/lists/scopingpln08/1554-arb\\_letter\\_sowell\\_12-9-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1554-arb_letter_sowell_12-9-08.pdf)

Original File Name: ARB Letter Sowell 12-9-08.PDF

Date and Time Comment Was Submitted: 2008-12-09 22:43:40

No Duplicates.

## **Comment 391 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: shirley

Last Name: gaston

Email Address: sslgaston@yahoo.com

Affiliation:

Subject: global warming

Comment:

I am a believer in using public transportation and try to use it as much as possible. It is difficult when there are not enough trains available especially on the week-end. If we have train transportation it would illeminate some use of the airplanes- like having a speed train from SF to Los Angeles would be great. Then we could build this across the US- what a great way to see the United States.

Global warming is a big concern and when considering land use reform transportation should be a big part of it.

Shirley Gaston

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-09 23:46:38

No Duplicates.

## **Comment 392 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael

Last Name: Pelizzari

Email Address: nextgalaxy@aol.com

Affiliation: People Acting in Community Together

Subject: Carbon Tax Needed

Comment:

When will CARB recognize that global warming is an emergency, and stop relying entirely on voluntary measures to deal with it? For some inexplicable reason, the words "carbon tax" are not even mentioned in your Proposed AB32 Scoping Plan. Your euphemism for it, "carbon fee", is only mentioned in passing but then promptly ignored, as if "tax" is unthinkable. No wonder the state is going bankrupt!

A carbon tax would be a much simpler, more direct, and more effective device for cutting carbon emissions than virtually anything else offered in the Scoping Plan. A gradually increasing carbon tax, starting at 5 cents per gallon (\$20 per ton of emitted carbon) and increasing 5 cents per year between now and 2100, would motivate practically everybody in the state to reduce their consumption of fossil fuels, without all the expensive micromanaging of the "Carbon Economy" envisioned by most of the contributors to the Scoping Plan. There is nothing like a punitive tax or fee to deter unwanted behavior. Phasing it in slowly but surely will minimize the pain to consumers, avoid a disruptive stampede away from fossil fuels, and eventually wean even the rich from fossil fuels.

This form of carbon tax could also alleviate the state's budget problems by generating a reliable revenue stream. It would grow during the early years at a predictable pace, and shrink in the later years as fossil fuel consumption is driven down by the ever more burdensome tax rate. By then the burgeoning Green Economy would provide a tax base that compensates for the falling carbon tax revenues.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 01:03:12

No Duplicates.

**Comment 393 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ashwani  
Last Name: Vasishth  
Email Address: vasishth@csun.edu  
Affiliation: CSUN

Subject: Strengthening the Land Use component for AB 32  
Comment:

Please consider that changing land use patterns is likely the single most necessary and effective way of cutting GHG emissions from transportation and settlements. Strengthen the standard! We all gain.

Regards,

-

Ashwani  
Vasishth

ashwani@csun.edu (818) 677-6137  
<http://www.csun.edu/~vasishth/>

-----  
Director  
Institute for Sustainability  
<http://blogs.csun.edu/sustainability>

Assistant Professor  
Department of Urban Studies and Planning  
California State University, Northridge  
18111 Nordhoff Street, SH 208, Northridge, CA 91330-8259  
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 04:32:21

No Duplicates.

**Comment 394 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Thomas

Last Name: Tanton

Email Address: ttanton@fastkat.com

Affiliation: Pacific research Institute

Subject: Scoping Plan adoption solutions

Comment:

Please see and file attached comments of the Pacific research Institute.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1566-written3.doc](http://www.arb.ca.gov/lists/scopingpln08/1566-written3.doc)

Original File Name: written3.doc

Date and Time Comment Was Submitted: 2008-12-10 06:26:49

No Duplicates.

**Comment 395 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sara  
Last Name: Birmingham  
Email Address: sara@solaralliance.org  
Affiliation: The Solar Alliance

Subject: Renewable Energy in the AB 32 Scoping Plan  
Comment:

Please see the attached letter in response to the AB 32 Scoping Plan.

Sara Birmingham  
Director of Western Policy  
The Solar Alliance

Attachment: [www.arb.ca.gov/lists/scopingpln08/1570-solar\\_alliance\\_letter\\_carb\\_121008.pdf](http://www.arb.ca.gov/lists/scopingpln08/1570-solar_alliance_letter_carb_121008.pdf)

Original File Name: Solar Alliance letter CARB 121008.pdf

Date and Time Comment Was Submitted: 2008-12-10 07:36:45

No Duplicates.

**Comment 396 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Clark

Last Name: Natwick

Email Address: clarkn@mac.com

Affiliation:

Subject: climate-friendly communities

Comment:

The best way for CARB to help build climate-friendly communities is to pass a larger emission reduction target for the land use sector in the AB-32 Scoping Plan. A higher target means that growth will be directed in ways that cut greenhouse gas emissions by lowering vehicle miles traveled, increasing opportunities for walking and biking, and making transit accessible for more people.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 07:50:38

No Duplicates.



## **Comment 397 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Linda

Last Name: Cooper

Email Address: linda\_cooper@comcast.net

Affiliation:

Subject: I propose animal agriculture be reduced in favor of plant-based agriculture :  
Comment:

According to a new report published by the United Nations Food and Agriculture Organization, the livestock sector generates more greenhouse gas emissions as measured in CO2 equivalent - 18 percent - than transport. It is also a major source of land and water degradation.

The global livestock sector is growing faster than any other agricultural sub-sector. When emissions from land use and land use change are included, the livestock sector accounts for 9 percent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 percent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure. And it accounts for respectively 37 percent of all human-induced methane (23 times as warming as CO2), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain. Livestock now use 30 percent of the earth's entire land surface, mostly permanent pasture but also including 33 percent of the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is a major driver of deforestation, especially in Latin America where, for example, some 70 percent of former forests in the Amazon have been turned over to grazing.

Please consider a reduction animal agriculture in favor of plant based agriculture.

Thank you  
Linda Cooper

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 07:52:51

No Duplicates.

**Comment 398 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mark S.

Last Name: Rentz

Email Address: markr@acwa.com

Affiliation: Association of CA Water Agencies

Subject: Comments on Proposed AB 32 Scoping Plan and Appendices

Comment:

Comment Letter Attached

Attachment: [www.arb.ca.gov/lists/scopingpln08/1576-nichols-ab\\_32.doc](http://www.arb.ca.gov/lists/scopingpln08/1576-nichols-ab_32.doc)

Original File Name: Nichols-AB 32.doc

Date and Time Comment Was Submitted: 2008-12-10 08:05:19

No Duplicates.

## **Comment 399 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Christine

Last Name: Finnie

Email Address: cfinnie@sbcglobal.net

Affiliation:

Subject: Scoping plan

Comment:

Dear CARB,

I have lived in California for 57 years and have watched it change--very little for the better. I still remember the day I drove home from UCLA to Palos Verdes, thinking there must be a fire because of the brown haze hanging over the ocean. I've seen traffic gridlock extend from commute hours to all day, every day. I've watched it in L.A. and in the Bay Area after I moved north.

Now I'm seeing different changes. Drought and water rationing are common in the Monterey Bay area where I now live. Water supplies are down to the lowest level in decades. Temperatures are so erratic it's difficult to grow my vegetable garden any more--even when I have water.

Even in the relatively short span of my lifetime, it's obvious things have changed. And, as I said, not for the better.

When good public transit was available, I used it and enjoyed it. But, sadly, because of poor coordination between transit districts and even worse coverage, I have not always been able to. A friend of mine recently tried to use the various transit systems to get from Santa Cruz to the San Jose Convention Center. The trip, though cost effective, was more than four times as long as driving would have been.

This must change. We need to stop destroying the beautiful state I was born in and want to pass along to my son. Usable public transit is essential to stop traffic gridlock, air pollution, and global warming. I urge you strongly to consider it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:12:57

No Duplicates.

## **Comment 400 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: dennis  
Last Name: mchale  
Email Address: dmacbluez2@cox.net  
Affiliation: Canyon Land Conservation Fund

Subject: Tighten Carbon Offsets  
Comment:

Hello,  
I wish to voice my concern that the scope of the CARB dialog is being moved along by the 'balance sheets' of Multi-National Corporations; other-than the health of the Earth and it's Living Things. If this CARB model is to be a benefit to the biosphere and natural environment it must at least be a mirror of the Euro Program.

Having worked in the construction trade for a good length of my life, I understand this premiss: 'if you have a question about the construction-you over build it'. Why would we under build something only to see it fail? In construction as in Program building this 'under building' will cause failure. A Program will fail or a home will fall as these are the end products of 'under building'. The value of 'over building' is no one will ever say "now why the heck did you do it that way?". The value is in it.

Already the foundation of a system exists on the Chicago Exchange and has for some time now. The CARB plan must be BETTER than that, I'm thinking. 'Cus this is the Golden State, we lead and very seldom follow.

Tightening Carbon Offsets in your CARB program will not undervalue your Program by 'under building', which seeks failure. But thru 'over building' we reap substained value.

Then at the end of the day--we can be rest assured; as the Founding Settlers of our State claimed--just as they crossed the High Sierras and saw the Golden Land: "we have done our best."

Thank you for your time in this matter,

Dennis McHale  
Citizen  
Canyon Land Conservation Fund

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:17:01

No Duplicates.



**Comment 401 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael

Last Name: Miller

Email Address: millereviron@earthlink.net

Affiliation: San Gabriel Valley Legislative Coalition

Subject: Comments on the Scoping Plan

Comment:

Attached is a letter from the San Gabriel Valley Legislative Coalition of Chambers of Commerce for your consideration.

Michael L. Miller  
Chairman

Attachment: [www.arb.ca.gov/lists/scopingpln08/1581-sgv\\_coalition\\_scoping\\_plan\\_letter\\_120908.doc](http://www.arb.ca.gov/lists/scopingpln08/1581-sgv_coalition_scoping_plan_letter_120908.doc)

Original File Name: SGV Coalition Scoping Plan Letter 120908.doc

Date and Time Comment Was Submitted: 2008-12-10 08:31:52

No Duplicates.

## **Comment 402 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: patty  
Last Name: rosewater  
Email Address: rosewater@me.com  
Affiliation: GreenTown Los Altos

Subject: Emission Target Reduction for Land Use in AB32  
Comment:

On November 22nd, our Cool Cities campaign convened a workshop in conjunction with Greenbelt Alliance and the Planning and Conservation League. A key message of that workshop was that land use planning is critical to our success in the fight against global warming.

The best way for CARB to help build climate-friendly communities is to pass a larger emission reduction target for the land use sector in the AB-32 Scoping Plan. A higher target means that growth will be directed in ways that cut greenhouse gas emissions by lowering vehicle miles traveled, increasing opportunities for walking and biking, and making transit accessible for more people.

The Board members meet on Thursday morning to approve the Scoping Plan and make any final changes. It looks like it will be a very close vote. Make your voice count by sending the enclosed letter to CARB and letting them know that land use reform is an important tool in the solution to climate change!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:49:34

No Duplicates.

## Comment 403 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Marc

Last Name: Roberts

Email Address: mroberts@ci.livermore.ca.us

Affiliation: Comm. Dev. Director, City of Livermore

Subject: Proposed Scoping Plan

Comment:

Thank you for the opportunity to comment on the Climate Change Proposed Scoping Plan dated October 2008. The City supports the Air Resources Board's efforts in implementing AB 32. Achieving the reduction of greenhouse gas (GHG) emissions to 1990 levels by year 2020 will require coordinated efforts between the state, regional and local agencies, private industry and California citizens. Local governments are facing enormous challenges guiding development of our communities and providing effective and efficient services to our residents given current economic conditions. Implementing the GHG emissions targets is necessary and desirable, but will add to these challenges. While generally supportive of the proposals in the Draft Scoping Plan, the City submits the following comments and concerns:

- Let SB 375 Work. Although the Scoping Plan acknowledges that the actual regional transportation-related GHG targets will be set through the regional process developed in SB 375, many are advocating that this number be raised. Given the deference the Scoping Plan gives to the SB 375 process, perhaps such an increase would largely be symbolic. However, since CARB has ultimate responsibility for setting the targets, a higher number would create political pressure for setting higher regional targets, regardless of the findings of the Regional Targets Advisory Committee. This is contrary to what SB 375 stands for.
- No Accounting for Infrastructure Costs. The Scoping Plan does not analyze the costs of infill infrastructure needed to serve more compact development patterns. For complex reasons stemming from the Takings Clause, Mitigation Fee Act, and other laws, local agencies cannot pay for the infrastructure from developer fees alone. Nor under Propositions 13 and 218, will they be able to raise assessment or other revenues. At the very least, CARB should have a detailed infrastructure feasibility analysis completed before it engages down this road. Indeed, this is precisely the type of issue that will be addressed by the Regional Targets Advisory Committee created by SB 375. CARB should let that process work.
- Acknowledging Current Economic Uncertainties. CARB must appropriately balance its climate goals with current economic uncertainties, which directly affect the feasibility of certain types of development. Increasing the target will make it more difficult for compact developments to achieve the California Environmental Quality Act (CEQA) streamlining contained in SB 375. As demonstrated by the Governor's proposed budget recommendations, such streamlining can have an important economic effect and help stimulate the economy.



Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 08:53:47

No Duplicates.

**Comment 404 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: James

Last Name: Fine

Email Address: [jfine@edf.org](mailto:jfine@edf.org)

Affiliation: Environmental Defense Fund

Subject: Reply to Criticisms of CARB AB32 Economic Evaluation

Comment:

Reply to Criticisms of CARB AB 32 Scoping Plan Economic Analysis by Dr. Chris Busch, Union of Concerned Scientists and Dr. James Fine, Environmental Defense Fund.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1592-ab32econevalreply.buschfine.pdf](http://www.arb.ca.gov/lists/scopingpln08/1592-ab32econevalreply.buschfine.pdf)

Original File Name: AB32EconEvalReply.BuschFine.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:15:01

No Duplicates.

**Comment 405 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Brian

Last Name: Morris

Email Address: [brianmorris@countyofplumas.com](mailto:brianmorris@countyofplumas.com)

Affiliation: County of Plumas

Subject: Climate Adaptation in the Scoping Plan

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1593-plumas\\_ab32\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/1593-plumas_ab32_scoping_plan_comments.pdf)

Original File Name: Plumas AB32 Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:15:40

No Duplicates.

**Comment 406 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Karen

Last Name: Hamman

Email Address: khamman@cityofmissionviejo.org

Affiliation: City Clerk, City of Mission Viejo

Subject: Mission Viejo's Comments to the California Air Resources Board on the AB 32 Scoping Plan

Comment:

Attached hereto is a copy of the City of Mission Viejo's comments on the CARB AB 32 Scoping Plan. We respectfully request that the attached comment letter be delivered to the California Air Resources Board Members for consideration at the December 11, 2008, public hearing on the Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1595-mvletter\\_ab32scopingplan\\_12-10-08\\_final.pdf](http://www.arb.ca.gov/lists/scopingpln08/1595-mvletter_ab32scopingplan_12-10-08_final.pdf)

Original File Name: MVletter\_AB32ScopingPlan\_12-10-08\_Final.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:45:19

No Duplicates.

**Comment 407 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Cabaniss

Email Address: [jcabaniss@aiaa.org](mailto:jcabaniss@aiaa.org)

Affiliation: Association of International Auto. Mfrs.

Subject: Comments on proposed AB 32 Scoping Plan

Comment:

AIAM Comments on CARB Proposed AB 32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1596-carb\\_ab\\_32\\_scoping\\_plan\\_comments\\_final.pdf](http://www.arb.ca.gov/lists/scopingpln08/1596-carb_ab_32_scoping_plan_comments_final.pdf)

Original File Name: CARB AB 32 Scoping Plan Comments final.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:45:25

No Duplicates.

**Comment 408 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: Alliance Comments on AB 32

Comment:

Please find the comments of the Alliance of Automobile Manufacturers.

Steven Douglas

Senior Director, Environmental Affairs

Attachment: [www.arb.ca.gov/lists/scopingpln08/1599-auto\\_alliance\\_comments\\_12-10-2008.pdf](http://www.arb.ca.gov/lists/scopingpln08/1599-auto_alliance_comments_12-10-2008.pdf)

Original File Name: Auto Alliance Comments 12-10-2008.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:56:01

No Duplicates.

**Comment 409 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Bill

Last Name: Bogaard

Email Address: [bbogaard@cityofpasadena.net](mailto:bbogaard@cityofpasadena.net)

Affiliation: City of Pasadena - Mayor

Subject: City of Pasadena's Comment Letter on CARB's Scoping Plan

Comment:

See Attached Letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1601-pasadena\\_comment\\_letter\\_to\\_carb\\_psp.pdf](http://www.arb.ca.gov/lists/scopingpln08/1601-pasadena_comment_letter_to_carb_psp.pdf)

Original File Name: Pasadena Comment Letter to CARB PSP.pdf

Date and Time Comment Was Submitted: 2008-12-10 09:58:49

No Duplicates.

**Comment 410 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Marie

Last Name: Larsen

Email Address: mlarsen@wsgr.com

Affiliation: Green Team leader at large SV Law Firm

Subject: AB32 Scoping Plan to Reduce Greenhouse Gas Emissions in CA

Comment:

Dear CARB,

I am writing to support approval of the AB 32 Scoping Plan as it is written. Although I agree in principle with the very laudable and ambitious goals regarding higher reduction targets for land use emissions that the Sierra Club and others recommend, I feel that Mary Nichols and team have put together a plan that is realistic and addresses/meets the needs of all stakeholders as well as can be expected at this time in our history. It provides effective enforcement controls and tools and is a pragmatic approach that has more likelihood of success in coopting various groups/interests in our CA community. It also sets a high standard and will hopefully be a model that is usable and will be adopted by other states in our global fight against ever-increasing global warming impacts.

Sincerely,  
Marie Larsen  
Green Team Leader  
Wilson Sonsini Goodrich & Rosati  
Palo Alto 94304

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:19:14

No Duplicates.



**Comment 411 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tara

Last Name: Marchant

Email Address: [taram@greenlining.org](mailto:taram@greenlining.org)

Affiliation:

Subject: Land Use Target: Increasing Co-Benefits for Communities

Comment:

Greenlining's comments on adoption of AB32-  
Brining about Co-Benefits to Marginalized Communities

Land Use  
Transportation  
Trading  
WCI

Attachment: [www.arb.ca.gov/lists/scopingpln08/1608-dec\\_11\\_2008\\_comments\\_submission.doc](http://www.arb.ca.gov/lists/scopingpln08/1608-dec_11_2008_comments_submission.doc)

Original File Name: DEC 11 2008 comments submission.doc

Date and Time Comment Was Submitted: 2008-12-10 10:27:02

No Duplicates.

**Comment 412 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kari

Last Name: Hamerschlag

Email Address: kariham@earthlink.net

Affiliation: New Harvest Consulting

Subject: Recommendations for a More Comprehensive Approach to Food and Agriculture Issues  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1609-new\\_harvest\\_ab\\_32\\_letter\\_final.doc](http://www.arb.ca.gov/lists/scopingpln08/1609-new_harvest_ab_32_letter_final.doc)

Original File Name: new harvest AB 32 letter final.doc

Date and Time Comment Was Submitted: 2008-12-10 10:28:55

No Duplicates.

**Comment 413 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Bloom

Email Address: houstgrp@pacbell.net

Affiliation: CSCME

Subject: CSCME Comments on ARB's Proposed Scoping Plan

Comment:

Please see the attached document that includes comments from the Coalition for Sustainable Cement Manufacturing & Environment (CSCME).

Attachment: [www.arb.ca.gov/lists/scopingpln08/1610-final\\_cscme\\_psp\\_comments\\_12-10-08.doc](http://www.arb.ca.gov/lists/scopingpln08/1610-final_cscme_psp_comments_12-10-08.doc)

Original File Name: FINAL CSCME PSP Comments 12-10-08.doc

Date and Time Comment Was Submitted: 2008-12-10 10:32:41

No Duplicates.

**Comment 414 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tracy

Last Name: Steinkruger

Email Address: TSteinkruger@ci.burbank.ca.us

Affiliation: City of Burbank

Subject: City of Burbank Comment Letter on Proposed Scoping Plan

Comment:

See attached letter and resolution.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1612-arb\\_comment\\_letter\\_\\_\\_resolution.pdf](http://www.arb.ca.gov/lists/scopingpln08/1612-arb_comment_letter___resolution.pdf)

Original File Name: ARB Comment Letter & Resolution.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:45:47

No Duplicates.

**Comment 415 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Shauna

Last Name: Clark

Email Address: catherinel@lhcity.org

Affiliation: City of La Habra Heights

Subject: Regional Transportation-Related GHG Reduction Target

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1613-lahabraheights\\_plancomments\\_121008.pdf](http://www.arb.ca.gov/lists/scopingpln08/1613-lahabraheights_plancomments_121008.pdf)

Original File Name: LaHabraHeights\_PlanComments\_121008.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:51:14

No Duplicates.

## **Comment 416 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Marsland  
Last Name: Susan  
Email Address: smarsland@att.net  
Affiliation:

Subject: Support AB32 Scoping Plan to Reduce GHG  
Comment:

To: California Air Resource Board

Please support AB32. California can be a leader by adopting AB32 and to decrease GHG and improve the health of vulnerable communities.

With the approval of AB32 Californians will do what we do best by leading the country and the global community forward by working on solutions and developing new technology. Passage of AB32 will revitalize the economy by creating green jobs and moving towards a "Green New Deal" where all members of society can participate.

It is time for political will to be bold and do what is best for the seventh generation.

Thank you for supporting AB32.  
Susan Gonsalves Marsland

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:52:22

No Duplicates.

**Comment 417 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mark  
Last Name: Reedy  
Email Address: Markr2121@aol.com  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

Dear Air Resources Board,

Approval of an aggressive AB 32 Scoping Plan is critical to the future health and well-being of our world and all its inhabitants faced with the stark realities of climate change. Please exercise your leadership by passing an aggressive AB 32 Scoping Plan.

Thank you.

Mark Reedy  
Sunnyvale, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 10:54:43

No Duplicates.

**Comment 418 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Kari  
Last Name: Decker  
Email Address: kdecker@apx.com  
Affiliation:

Subject: APX comments on AB 32 Scoping Plan  
Comment:

Please see attached. Thank you.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1616-apx.comments.sp.12.10.pdf](http://www.arb.ca.gov/lists/scopingpln08/1616-apx.comments.sp.12.10.pdf)

Original File Name: apx.comments.SP.12.10.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:55:23

No Duplicates.



**Comment 419 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dan

Last Name: Kalb

Email Address: dkalb@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Feebates in the AB 32 Scoping Plan

Comment:

Attached are our comments in support of FEEBATES in the AB 32 Scoping Plan. -Dan Kalb and Spencer Quong

Attachment: [www.arb.ca.gov/lists/scopingpln08/1618-ucs\\_comments\\_on\\_feebates\\_in\\_the\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1618-ucs_comments_on_feebates_in_the_scoping_plan.pdf)

Original File Name: UCS comments on Feebates in the Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-10 10:59:50

No Duplicates.

**Comment 420 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Karl

Last Name: Gawell

Email Address: karl@geo-energy.org

Affiliation: Geothermal Energy Association

Subject: GEA Comments on the CARB October 2008 Climate Change Proposed Scoping Plan  
Comment:

Attached are comments submitted on behalf of the Geothermal Energy Association. They are in PDF format. Please let me know if another format, such as a word document, is preferred. Thank you for considering our views.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1619-final\\_gea\\_comments\\_on\\_carb\\_plan\\_dec\\_10\\_2009.pdf](http://www.arb.ca.gov/lists/scopingpln08/1619-final_gea_comments_on_carb_plan_dec_10_2009.pdf)

Original File Name: Final\_GEA\_comments\_on\_CARB\_plan\_Dec\_10\_2009.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:02:12

No Duplicates.

## **Comment 421 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dan

Last Name: Miller

Email Address: dmiller@savemart.com

Affiliation:

Subject: Heavy Duty Green House Gas

Comment:

- As a result of the Green House Gas (Smartway) proposal, we are delaying the purchase of new trailers.
- While only 5% of our trailer fleet (25units) is 53', we had planned on replacing a number of the older smaller trailers with 53' to increase efficiencies. The efficiencies I speak of are in reduced trips by carrying more product on fewer trailers. On a quarterly review of onw of our divisions we can reduce the number of loads by 1,000 which saves 281,000 miles and 37,492 gallons of fuel or 149,968 gallons a year.
- Under the proposed regulation, 53' trailers will not work in our environment. Dise fairings will not allow us to get into many of the pits at our stores without substantial damage to the fairings. The estiamted additional cost of these Smartway trailers will not be offsett by added fuel savings as has been suggested. Smartway fuel savings are calculated on an average speed of 62 mph. The legal speed in CA is 55 mph and our average fleet speed is 45.7 mph based on on board computers
- Our company has a very aggressive fuel savings program not only to benefit the environmebnt but also to help offsett expenses. WE govern the top speed of all tracctors to the legal limit in CA. We monitor and enforce minimal idling, long before it was mandated. We spec cruise control on our equipment and encourage its use. We continually test new tire designs for fuel economy and longevity.
- I encourage the Board to seriously consideer voting against this regulation as it will not achieve the fuel savings and cost offsetts as proposed for trucks operating in CA. Thanks you for your consideration of this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:09:45

No Duplicates.

**Comment 422 for AB 32 Scoping Plan (scopingpln08) - 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 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.

See attached public comment letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1622-cfase\\_carb\\_ab\\_32\\_scoping\\_plan\\_public\\_comments\\_\\_12-10-08.doc](http://www.arb.ca.gov/lists/scopingpln08/1622-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 11:13:56

No Duplicates.

**Comment 423 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Dan

Last Name: Weinheimer

Email Address: dweinheimer@san-marcos.net

Affiliation: City of San Marcos

Subject: Comments on Proposed Scoping Plan

Comment:

Please accept the attached comment letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1623-pm\\_carb\\_proposedscopingplan\\_commentletter\\_11.17.08.doc](http://www.arb.ca.gov/lists/scopingpln08/1623-pm_carb_proposedscopingplan_commentletter_11.17.08.doc)

Original File Name: PM CARB ProposedScopingPlan Commentletter 11.17.08.doc

Date and Time Comment Was Submitted: 2008-12-10 11:18:02

No Duplicates.

**Comment 424 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jacki  
Last Name: Bacharach  
Email Address: jacki@southbaycities.org  
Affiliation: South Bay Cities Council of Governments

Subject: AB 32 scoping plan comments  
Comment:

Attached please find the comments from the South Bay Cities Council of Governments.

Jacki Bacharach  
Executive Director

Attachment: [www.arb.ca.gov/lists/scopingpln08/1624-12.10.08\\_final\\_scoping\\_plan\\_comments.doc](http://www.arb.ca.gov/lists/scopingpln08/1624-12.10.08_final_scoping_plan_comments.doc)

Original File Name: 12.10.08 final scoping plan comments.doc

Date and Time Comment Was Submitted: 2008-12-10 11:19:20

No Duplicates.

**Comment 425 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: David

Last Name: Early

Email Address: david@dceplanning.com

Affiliation: Design, Community & Environment

Subject: DC&E Comments on Proposed AB 32 Scoping Plan

Comment:

DC&E respectfully submits the attached comments on the Proposed AB 32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1625-nichols\\_-\\_comments\\_on\\_proposed\\_ab\\_32\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1625-nichols_-_comments_on_proposed_ab_32_scoping_plan.pdf)

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

Date and Time Comment Was Submitted: 2008-12-10 11:20:09

No Duplicates.

## Comment 426 for AB 32 Scoping Plan (scopingpln08) - 45 Day.

First Name: Adam  
Last Name: Lazar  
Email Address: adamlazar@gmail.com  
Affiliation:

Subject: Aircraft emissions in AB32 scoping plan  
Comment:

Plain text version of comments follows; also included as an attachment in Microsoft Word.

\*\*\*\*\*

Aircraft Emissions and the AB32 Cap-And-Trade Program

December 10, 2008

Submitted By:

Adam Lazar (SBN 237485)  
1726 Page St Apt. 3  
San Francisco, CA 94117

### Introduction

On behalf of myself and the public interest, the author respectfully submits these comments regarding the need to include airplane emissions in the AB32 Scoping Plan's cap-and-trade program.

The European Union has determined that aviation emissions contribute over three percent of the EU's greenhouse gases, most of which are not subject to regulation under the Kyoto Protocol. The EU responded this year by including aircraft emissions in their cap-and-trade program.

Aircraft engines emit significant levels of carbon dioxide, carbon monoxide, hydrocarbons, volatile organic compounds, nitrogen oxides, and particulate matter. It is well known that the carbon footprint of a commercial airplane far exceeds that of any other common mode of transportation. Moreover, the high-altitude discharge of greenhouse gases by aircraft engines cause a disproportionate impact on the atmosphere relative to surface discharges.

Yet the California AB32 Scoping Plan appears to have overlooked these contributions and impacts entirely. This despite the seemingly large focus on other types of mobile sources in the Plan, via a combination of new engine and/or fuel regulations and the Pavley regulation of on-road vehicles. Given these other foci it is even more striking that references to aviation-derived emissions are wholly absent.

### Possible Justifications for Exclusion

It is possible that regulation of aircraft emissions could derive from the Scoping Plan's "inclusion of transportation fuels in the



cap-and-trade program." If this is so then the Scoping Plan should specifically identify aircraft fuel as included. Instead, there is a striking absence of discussion of aircraft in the text.

Regardless, the inclusion of transportation fuels should be complimentary to, and not independent of, inclusion of aircraft emissions in the proposed cap-and-trade system.

#### Aircraft Emissions As Incorporated Into EU Emissions Trading Scheme

In September, 2008 the European Union issued a proposed directive to incorporate aircraft emissions into the EU Emissions Trading Scheme ("ETS"). The ETS is the Cap-and-Trade emissions program by which the EU meets its CO2 targeted reductions under the Kyoto Protocol.

The EU proposed directive will require every plane departing from an EU member airport to purchase emissions credits to cover the CO2 emitted by the aircraft during flight. This credit requirement applies regardless of the nationality of the aircraft operator.

California, like the EU, needs to include aircraft emissions in its cap-and-trade plan. California should become a world leader in regulating greenhouse gas emissions; a world leader should not ignore wholesale as large an issue as aircraft emissions. Note also that no entity has yet petitioned the US Environmental Protection Agency to regulate carbon dioxide emissions from aircraft. As with agricultural emissions, this area clearly needs to be more extensively regulated by the AB32 scoping plan.

#### Addition of a Performance Based Standard

CARB should consider additional regulation of aircraft emissions through performance-based standards on aircraft engines. This regulation is a reasonable and logical extension of the proposed regulation of other types of engines within the Scoping Plan.

#### Aviation Emissions Reductions Through Public Transportation Projects (e.g. high speed rail)

The Scoping Plan fails to specifically account for aircraft emissions reductions achieved through implementation of the California High Speed Rail. This despite the fact that the Los Angeles- San Francisco Bay Area market is far and away the largest aviation market in the state. Instead, the Plan only credits creation of high-speed rail for a single reduction in MMTCO2E in 2020—clearly undervalued if concurrent reductions in aircraft emissions are included.

#### Co-Benefit of Cap-and-Trade and Regional Air Quality Attainment

The AB32 scoping plan specifically attempts to identify public health benefits derived from climate change regulations. The NRDC identified aircraft emissions as a major contributing factor to regional non-attainment of air quality standards. Reducing aircraft emissions through their inclusion in California's cap-and-trade system would provide clear health benefits in areas such as those surrounding LAX.

#### Additional Means to Achieve Significant Aircraft Emissions Reductions Through Airport Efficiency

In addition to including airplane emissions in California's cap-and-trade scheme, the ARB should also include emissions-reducing measures both at the airport and/or as mandatory offsets for commercial ticket purchase. Virgin Atlantic Airlines has demonstrated how to decrease aircraft emissions at airports through towing aircraft from the gate to the taxiway. Continental Airlines has pioneered a program for customers to purchase carbon offsets for their flights. Each of these programs point to the variety of measures that could be considered by the ARB in its inclusion of aviation emissions in the AB32 Scoping Plan.

#### Historical Omission of Aircraft Emissions In Air Regulation

Aircraft emissions are historically regulated less than other common forms of transportation, leaving most meaningful emission reductions to a secondary benefit from improvements in efficiency and fuel burn. When NRDC conducted a survey of major airports across the country, it found that "Airports are not regulated in the same manner as other significant air pollution sources. Neither airports nor airlines are held accountable for the aggregate impacts of their ground-level aircraft emissions." Given this history of under-regulation it is even more important to include aviation emissions in the AB32 scoping plan.

#### Conclusion

With the EU taking firm action on aircraft emissions as a significant contributor to global GHG emissions, California should attempt to mirror these efforts in order to create a position of global leadership for market-based emission reduction programs. Aircraft emissions should be included in the AB32 Cap-and-Trade plan, and performance-based standards for aircraft engines should be complementarily implemented. The large direct benefit of these measures is further amplified by the indirect public health benefits in areas of high-density air traffic such as LAX. For all of these reasons, aviation should be addressed extensively, and control of their emissions should be integrated into the AB32 Scoping Plan document.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1626-alazar\\_aviation\\_ab32\\_comments.zip](http://www.arb.ca.gov/lists/scopingpln08/1626-alazar_aviation_ab32_comments.zip)

Original File Name: Alazar Aviation AB32 comments.zip

Date and Time Comment Was Submitted: 2008-12-10 11:20:39

No Duplicates.

**Comment 427 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Willard

Last Name: Richards

Email Address: willard@sonic.net

Affiliation: Sonoma Co. Transp. and Land Use Coalit'n

Subject: Increase the land use and transportation targets

Comment:

Abstract from attachment:

While there is much that is commendable about this plan, we believe that it is essential that the plan be strengthened in order to be effective. In this regard, we are particularly concerned that the land use and transportation targets be revised upward from 5 MMT to between 11-14 MMT.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1627-nichols\\_re\\_ab32\\_land\\_use.pdf](http://www.arb.ca.gov/lists/scopingpln08/1627-nichols_re_ab32_land_use.pdf)

Original File Name: Nichols re AB32 Land Use.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:21:56

No Duplicates.

## **Comment 428 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Adam

Last Name: Lazar

Email Address: adamlazar@gmail.com

Affiliation:

Subject: Agriculture in AB32 scoping plan

Comment:

Plain text version of comments follows; also included as an attachment in Microsoft Word. The text version below omits the footnote references in the Word document.

\*\*\*\*\*

AB32 Proposed Scoping Plan and (Non) Regulation of Agricultural Emissions

December 10, 2008

Submitted by:

Adam Lazar (SBN 237485)

1726 Page St Apt. 3

San Francisco, CA 94117

On behalf of myself and the public interest, I respectfully submit these comments regarding agricultural emissions of greenhouse gases in the AB32 Proposed Scoping Plan.

The AB32 Proposed Scoping Plan identifies agriculture and food processing as the source of 9% of California's greenhouse gas emissions. Given the limited estimation of agricultural emissions by the ARB, and the omission of fertilizer-related emissions, this number is likely far less than the actual total agricultural emissions.

With such a significant amount of GHG emissions at stake, no exception for agricultural sources should be made under AB32. Yet the Scoping Plan provides a near-total exclusion of agriculture from emissions reductions. Instead of providing meaningful regulation of this source, the scoping plan goes only so far as to provide for voluntary reductions through usage of manure digesters at CAFO dairy operations. The Proposed Scoping Plan foresees no mandatory regulation of agricultural sources in the short term, and the possibility of only a very limited degree of regulation in the long-term. Lest one think the ARB believes this to be meaningful emissions reduction, the measure is given no reduction credit short term and only 1 long-term. Even the extremely early-stage and speculative California High Speed Rail receives more credit.

The Scoping Plan should include meaningful measures to reduce the methane gas from Concentrated Animal Feeding Operations. On the one hand, these measures could compel the manure digesters already described in the Plan, and should additionally include mandatory capture from enclosed cattle buildings at CAFO's and covered

storage for animal waste lagoons. Not only would such mandatory covering work in tandem with requiring waste digesters, resulting in an immediate reduction in methane gases, but it would have tremendous co-benefits for public health from the reduction in airborne particulate matter. Likewise, prohibiting the open exposure (e.g. drying) of animal waste would further reduce methane and particle emissions.

All of these controls could be required in a meaningful regime of agricultural emissions reductions. However, given the market-based leanings of the AB32 Scoping Plan, the best solution may be to include agricultural emissions in the cap-and-trade system.

Methane capture is an accepted practice with over thirty participating dairies in the Central Valley alone. A recent study of Central Valley dairies concluded that many digester systems are already on the market. Notably, the study concludes that GHG emissions from CAFO's should be included in a cap-and-trade system. When integrated into cap-and-trade, the study finds that the GHG offsets combined with electricity generation create a positive cash balance for a farmer. Given this potential, the ARB should not hesitate to bring agriculture under the system.

#### Co-Benefits of Improved Waste Holding Requirements for Methane and Particulates

Methane capture at CAFO's is perhaps unique in the tremendous co-benefits afforded by its process; these co-benefits include both energy production and a major decrease in regional airborne particulate matter.

A critical missed co-benefit in the AB32 Scoping Plan is the improvement in air quality from isolating animal waste lagoons from direct exposure. This isolation is a complimentary result to instituting a waste digestion system in a CAFO's as considered as a voluntary measure.

Need to Include Fertilizer-Related Emissions In Agricultural GHG The Plan credits these emissions to "largely methane emissions from animals and their waste." However, agricultural fertilizer application should also be included in this sum, which would be no small addition—as much as 90 million metric tons of CO2 per year are used by CAFO's, a full half of which is attributable to food crop production. Further, at least one study notes that fertilizer must be included in the emissions regulatory regime because otherwise the methane capture practices "could induce secondary effects that diminish water quality (e.g. switching to crops with greater fertilizer requirements.)" Even so, the study concludes that between 60 and 70 million tons of crop-related carbon emissions can be mitigated—while leading to a 2% improvement in water quality.

Even with the inclusion of fertilizer, however, the Scoping Plan underestimates the contribution of CAFO's to localized and highly concentrated greenhouse gas emissions in California. The plan does not acknowledge that California's Central Valley contains the highest concentration of dairy CAFO's in the world, leading to an inordinately high level of localized greenhouse gas emissions. Combine this concentration with a recent study delineating the contribution to greenhouse gas emissions from agricultural sources that "surpass those of the transportation sector," and it is

reasonable to conclude that agricultural emissions contribute far more than 9% of state greenhouse gas emissions.

Conclusion

Do not give agriculture an exception to AB32. The California Legislature made no such exception in their legislation, and the ARB's exclusion of this sector from the Scoping Plan is a violation of the letter and intent of the law. Global farm animal production is expected to double by 2050. We must act now to combat this challenge.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1628-alazar\\_agricultural\\_emissions.zip](http://www.arb.ca.gov/lists/scopingpln08/1628-alazar_agricultural_emissions.zip)

Original File Name: Alazar agricultural emissions.zip

Date and Time Comment Was Submitted: 2008-12-10 11:26:16

No Duplicates.

**Comment 429 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Busco

Email Address: john.busco+politik@gmail.com

Affiliation:

Subject: Reduce greenhouse gases in land use plans

Comment:

Please include an aggressive emission reduction target for the land use sector in the AB-32 Scoping Plan.

Growth should be directed by lowering vehicle miles traveled, increasing opportunities for walking and biking, and making transit accessible for more people.

Thank you for your consideration.

John Busco

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:27:28

No Duplicates.

**Comment 430 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Del  
Last Name: Schembari  
Email Address: bat025@yahoo.com  
Affiliation:

Subject: AB 32  
Comment:

I've been asked by the Sierra Club to send a message considering green house gases in land use policy. I wholeheartedly accept their stance on this issue.

When voting for the next governor, and state offices, this factor will be a major criteria while considering who to vote for.

Please do all you can to reduce greenhouse gases. Let's keep California a cutting edge leader so the nation can follow our example.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:32:32

No Duplicates.



**Comment 431 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Bruce

Last Name: Ambo

Email Address: bambo@morro-bay.ca.us

Affiliation: City of Morro Bay

Subject: City of Morro Bay Comments on Proposed Scoping Plan

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1631-08\\_dec\\_morro\\_bay\\_comments\\_carb\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1631-08_dec_morro_bay_comments_carb_scoping_plan.pdf)

Original File Name: 08 Dec Morro Bay Comments CARB Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:32:40

No Duplicates.

**Comment 432 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ronald  
Last Name: Cohen  
Email Address: rccohen@berkeley.edu  
Affiliation: UC Berkeley

Subject: Climate Change Proposed Scoping Plan, October 2008; Tracking and measuring progress

Comment:

see attached file

Attachment: [www.arb.ca.gov/lists/scopingpln08/1632-scoping\\_plan\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/1632-scoping_plan_letter.pdf)

Original File Name: scoping\_plan\_letter.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:34:52

No Duplicates.

**Comment 433 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tony  
Last Name: Picarello  
Email Address: [tpicarello@westport.com](mailto:tpicarello@westport.com)  
Affiliation: Westport

Subject: GHG and Criteria Pollutant Emissions Estimator  
Comment:

Please See Attached Letter & Report

Attachment: [www.arb.ca.gov/lists/scopingpln08/1633-tiax\\_report.zip](http://www.arb.ca.gov/lists/scopingpln08/1633-tiax_report.zip)

Original File Name: TIAX Report.zip

Date and Time Comment Was Submitted: 2008-12-10 11:36:50

No Duplicates.

**Comment 434 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Renee

Last Name: Zeimer

Email Address: zeimer@walnut-creek.org

Affiliation: City of Walnut Creek

Subject: Comments on Scoping Plan

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1634-cityofwalnutcreekcomments.scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1634-cityofwalnutcreekcomments.scoping_plan.pdf)

Original File Name: CityofWalnutCreekComments.Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:38:10

No Duplicates.

**Comment 435 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation:

Subject: Open Letter Re: AB 32 Scoping Plan Cost Concerns From Business and Taxpayer Groups

Comment:

Attached please find an 'Open Letter' to CARB Chair Mary Nichols from 65 of California's business and taxpayer organizations discussing cost concerns of the Scoping Plan as it is currently written.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1635-open\\_letter\\_to\\_carb\\_12\\_10.pdf](http://www.arb.ca.gov/lists/scopingpln08/1635-open_letter_to_carb_12_10.pdf)

Original File Name: Open Letter to CARB 12\_10.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:41:50

No Duplicates.

**Comment 436 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jim

Last Name: Sandoval

Email Address: jim.sandoval@ch2m.com

Affiliation: Bay Area Clean Water Agencies

Subject: Scoping Plan Comment Letter

Comment:

Please find the attached comment letter on the Scoping Plan that I'm am sending ARB on behalf of the Bay Area Clean Water Agencies.  
Regards,  
Jim Sandoval

Attachment: [www.arb.ca.gov/lists/scopingpln08/1636-bacwa\\_scoping\\_plan-comment\\_letter\\_-\\_signed.pdf](http://www.arb.ca.gov/lists/scopingpln08/1636-bacwa_scoping_plan-comment_letter_-_signed.pdf)

Original File Name: BACWA\_SCOPING\_PLAN-Comment\_Letter - signed.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:42:55

No Duplicates.

**Comment 437 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Matt

Last Name: Mogensen

Email Address: matt.mogensen@fountainvalley.org

Affiliation: City of Fountain Valley, CM Office

Subject: City of Fountain Valley Comment Letter on Draft Scoping Plan

Comment:

Please find the attached City of Fountain Valley comment letter on the CARB's Draft Scoping Plan from Mayor Guy Carrozzo.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1637-fountain\\_valley\\_draft\\_scoping\\_plan\\_comment\\_letter.pdf](http://www.arb.ca.gov/lists/scopingpln08/1637-fountain_valley_draft_scoping_plan_comment_letter.pdf)

Original File Name: Fountain Valley Draft Scoping Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:46:40

No Duplicates.

**Comment 438 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jim  
Last Name: Sandoval  
Email Address: jim.sandoval@ch2m.com  
Affiliation: Calif. Wastewater Climate Change Group

Subject: Comment Letter on AB 32 Scoping Plan  
Comment:

Please find the attached comment letter on the Scoping Plan that I am sending to the ARB on behalf of the California Wastewater Climate Change Group (CWCCG).  
Regards,  
Jim Sandoval

Attachment: [www.arb.ca.gov/lists/scopingpln08/1638-20081210-cwccg-ab32-scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/1638-20081210-cwccg-ab32-scoping_plan_comments.pdf)

Original File Name: 20081210-CWCCG-AB32-Scoping\_Plan\_comments.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:47:15

No Duplicates.



**Comment 439 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Murphy

Email Address: rmurphy@ierdc.org

Affiliation: Institute for Energy Research

Subject: IER Comments on AB 32 Scoping Plan

Comment:

Attached are IER's critical comments on the economic analysis contained in Appendix G of the Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1639-ier\\_comments\\_ab32\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1639-ier_comments_ab32_scoping_plan.pdf)

Original File Name: IER\_Comments\_AB32\_Scoping\_Plan.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:50:30

No Duplicates.

**Comment 440 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lisa

Last Name: Goldman

Email Address: lgoldman@ci.alameda.ca.us

Affiliation: City of Alameda

Subject: City of Alameda comments on draft Scoping Plan

Comment:

Please see the attached letter from the Mayor of Alameda.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1640-letter\\_to\\_mary\\_nichols.pdf](http://www.arb.ca.gov/lists/scopingpln08/1640-letter_to_mary_nichols.pdf)

Original File Name: letter to Mary Nichols.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:50:38

No Duplicates.

**Comment 441 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: William  
Last Name: Westerfield  
Email Address: amercad@smud.org  
Affiliation: SMUD

Subject: SMUDs Comments of AB 32 Scoping Plan  
Comment:

Attached please find SMUD's Comments for the AB 32 Scoping Plan.  
If you have any questions, please contact Araceli at 916 732-6447.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1641-smuds\\_arb\\_scoping\\_plan\\_comments.doc](http://www.arb.ca.gov/lists/scopingpln08/1641-smuds_arb_scoping_plan_comments.doc)

Original File Name: SMUDs ARB Scoping Plan Comments.doc

Date and Time Comment Was Submitted: 2008-12-10 11:50:41

No Duplicates.

**Comment 442 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: LeiLani

Last Name: Johnson Kowal

Email Address: leilani.johnson@ladwp.com

Affiliation: Los Angeles Department of Water & Power

Subject: LADWP Comments on Proposed Scoping Plan

Comment:

Attached please find the Los Angeles Department of Water and Power's (LADWP) comments on the Proposed Scoping Plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1642-ladwp\\_-\\_proposed\\_scoping\\_plan\\_comments\\_12-10-2008\\_final.pdf](http://www.arb.ca.gov/lists/scopingpln08/1642-ladwp_-_proposed_scoping_plan_comments_12-10-2008_final.pdf)

Original File Name: LADWP - Proposed Scoping Plan Comments 12-10-2008 final.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:50:55

No Duplicates.

**Comment 443 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael  
Last Name: Wallis  
Email Address: wallis@ebmud.com  
Affiliation: EBMUD

Subject: Nichols-AB 32 Scoping Plan  
Comment:

Attached are comments from EBMUD regarding the AB 32 Scoping Plan

Attachment: [www.arb.ca.gov/lists/scopingpln08/1643-ab\\_32\\_comment\\_letter\\_12-10-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1643-ab_32_comment_letter_12-10-08.pdf)

Original File Name: AB 32 comment letter 12-10-08.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:52:21

No Duplicates.

## **Comment 444 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Andy  
Last Name: Katz  
Email Address: andyk@ggbreathe.org  
Affiliation: Breathe California

Subject: Support Proposed Scoping Plan  
Comment:

December 10, 2008

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812-2815

RE: Support for Proposed Scoping Plan

Chair Nichols and ARB Members:

Breathe California strongly supports the Proposed Scoping Plan, which will protect public health by reducing greenhouse gas emissions that are causing the temperature to rise and the climate to change. Increased temperatures increase the number and severity of days with unhealthy exposure to ozone, causing asthma attacks and respiratory disease.

Cumulative Impacts and Public Health Role

We encourage the Board to implement policies that will provide for a formal role for public health agencies to comment and inform the decision-making process as proposed rules are developed. While it is critical to counter the adverse consequences of climate change, it must be done in a way that does not harm the health of communities already impacted by polluting sources.

Strong Land Use Targets Needed

We urge the ARB to set a strong land use target in the range of 11 - 14 MMT. This is based on a recent scientific analysis by Dr. Reid Ewing and Dr. Arthur C. Nelson which shows that these reductions are achievable with policies California is already contemplating. This higher target will need to be combined with a commitment to support regions, local government, and transportation agencies with the financial resources to achieve the target. The Proposed Scoping Plan indicates that carbon auction revenues from transportation fuel are a potential source for this financial support.

Thank you for your continued leadership in protecting public health.

Sincerely,

Andy Katz

Attachment: [www.arb.ca.gov/lists/scopingpln08/1644-12.10.08\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/scopingpln08/1644-12.10.08_scoping_plan.doc)

Original File Name: 12.10.08 Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-12-10 11:53:03

No Duplicates.

**Comment 445 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.



## **Comment 446 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Jennifer

Last Name: De Lurgio

Email Address: environmental-steward@hotmail.com

Affiliation:

Subject: Cap-and-Trade Concerns

Comment:

Greetings Chairwoman Nichols and Board Members:

I am an energy management student at the wonderful Environmental Studies Division of De Anza Community College, and an Environmental Programs intern at the City of Morgan Hill. I am inspired by AB 32 legislation, and am committed to helping California succeed in it's specified goals.

As you know, climate chaos due to human-caused actions contributing to global warming may very well mean the end of our lives as we know them on this beautiful planet. Because California is a sentinel for our country, and indeed the world, we need solid and exact measures to ensure we meet AB 32 emissions reductions requirements.

I am concerned that with a number of aspects to the the proposed cap-and-trade program. First, a cap-and-trade program is vulnerable to special interests manipulation which is often hard to prove. Entities can fudge accounting so that CO2 emissions actually increase, even though reductions are claimed. Emissions reductions results would be too hard to quantify, enforce, and verify.

Although certain businesses would profit from the market mechanism of cap-and-trade, the customer will pay more, while getting less. The Scoping Plan proposes that up to 49% of emissions reductions will be allowed to take place from offsets. Much less innovation and alternatives would be encouraged with a cap-and-trade program allowing offsets, than would with a carbon tax. Californian residents will also see less benefits as offsets for California emissions are allowed to occur outside of the state.

As you know, many environmental and economic experts are in favor of a carbon fee. The IPCC estimates that in order to stabilize GHG emissions at an acceptable level, a tax of around \$50 for each metric ton would be needed worldwide. I believe a cap-and-fee program would be a much better alternative and should be thoroughly considered before California sets the precedent with measures which are inadequate to get the job done.

Thank you for reading my comments!

-Jennifer De Lurgio

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:55:46

No Duplicates.

## **Comment 447 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lisa  
Last Name: Kayser-Grant  
Email Address: lkgrant3@earthlink.net  
Affiliation:

Subject: Strengthen commitment to land use reform in AB 32 Scoping Plan  
Comment:

Dear Members of CARB,

Please strengthen your commitment to land use reform in the AB 32 Scoping Plan. Many policy makers agree that you can double or triple your commitment of greenhouse gas reduction from land use, from the current 5 million metric tons to up to 14.

Land use has a tremendous impact on the generation -- or lack thereof -- of greenhouse gases. Communities need the push to require more dense, walkable/bikeable, transit-oriented development, which can greatly reduce the production of greenhouse gases.

In my community development decisions are basically made by developers: whatever they propose is what the city council and supervisors end up accepting. We need strong incentives and rules directing development and redevelopment to give municipalities the direction and backing they need to create communities that help us reduce greenhouse gases instead of increasing them.

Please take strong action now to reform land use in order to reduce greenhouse gases.

Sincerely,

Lisa Kayser-Grant

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 11:56:35

No Duplicates.

**Comment 448 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Allan

Last Name: Krauter

Email Address: akrauter@co.kern.ca.us

Affiliation: Kern County Administrative Office

Subject: County of Kern Comments on AB 32 Scoping Plan

Comment:

Attached are comments from Supervisor Michael J. Rubio, Chairman of the Kern County Board of Supervisors, to the California Air Resources Board regarding the AB 32 Scoping Plan. By unanimous vote of the Board, Supervisor Rubio has been authorized to submit the attached comments on behalf of the County of Kern.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1649-county\\_ab\\_32\\_scoping\\_plan\\_comments.doc](http://www.arb.ca.gov/lists/scopingpln08/1649-county_ab_32_scoping_plan_comments.doc)

Original File Name: County AB 32 Scoping Plan Comments.doc

Date and Time Comment Was Submitted: 2008-12-10 11:59:03

No Duplicates.

## **Comment 449 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gary  
Last Name: Patton  
Email Address: gapatton@stanfordalumni.org  
Affiliation: As An Individual

Subject: Comments on Climate Change Proposed Scoping Plan  
Comment:

December 10, 2008

Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Comments on Climate Change Proposed Scoping Plan

Dear Ms. Nichols and Members of the Board:

I am currently serving as the General Counsel of the Planning and Conservation League (PCL), and in that capacity I participated in the passage of AB 32 and have been closely following the development and review of the proposed Climate Change Scoping Plan mandated by that historic legislation. PCL has submitted official comments to your Board on the Proposed Scoping Plan, with which I agree. This comment, however, is submitted personally, and not on behalf of PCL. Its purpose is to highlight my concern that the ARB (on which I briefly served) infuse an increased sense of urgency into the Scoping Plan.

Global warming is more than just "inconvenient." We face a human-caused challenge to the continued existence of human life as we know it. Global warming puts the natural environment in great peril, but our human economic and political institutions are in even greater danger. While we tend to think of global warming in "linear" terms, in which we anticipate slowly escalating world temperatures, the facts are most probably otherwise. Uncontrollable positive feedback processes can quickly transform world climate in incredibly adverse ways if we reach certain "tipping points." Significant releases of trapped methane, caused by the loss of permafrost, and the loss of arctic ice, opening up new areas of ocean for heat absorption, can profoundly change global temperatures, with horribly adverse results. And these changes can come upon us rapidly, even within a single decade. Dr. James E. Hansen, and the National Aeronautics and Space Administration, have been quoted as saying that we must significantly curtail greenhouse gas emissions by no later than 2016 to avoid a climate catastrophe.

In view of the enormity of the global warming challenge, we can be justifiably proud that AB 32 has made a commitment, on behalf of all Californians, that we will actually roll back the emission of greenhouse gases in this state. We cannot afford, however, to be self congratulatory. I am writing to urge the ARB to demonstrate an

increased sense of urgency about the global warming crisis that confronts our state, nation, and world.

Business as usual is a prescription for disaster. I believe that if we can do something to reduce greenhouse gas emissions, then we must do it, and we must act at the earliest possible time. In World War II, facing a different type of challenge to the continued existence of human civilization, the United States made fundamental changes in its economy in about two years time. We need to do the same now. We need, in other words, to require ourselves to take prompt action, not just say it would be a good idea - and not just hope that "the market," or "incentives," will somehow make it happen.

I have several specific comments on the October 2008 Draft Scoping Plan:

1. The Executive Summary in the October 2008 Draft Scoping Plan ends with this quote from Governor Schwarzenegger: "We owe our children and we owe our grandchildren. We simply must do everything in our power to fight global warming before it is too late (emphasis added)." I urge the ARB to insist that the policies and programs set forth in the Final Scoping Plan in fact "do everything" we have the power to do.
2. In the "Introduction" to the Draft Scoping Plan, on Page 3, the ARB notes that it has increased the anticipated greenhouse gas emission reductions for Regional Transportation-Related Greenhouse Gas Targets from 2 to 5 million metric tons of CO2 equivalent, compared to the first iteration of the draft plan. This is the right direction, but it's not far enough. What we are talking about here is a commitment to end the sprawling land use patterns which not only cause global warming, but which also destroy farmlands, natural resource lands, and undermine the social stability of our communities. I urge a target of not less than 14 million metric tons of CO2 equivalent, which studies submitted to the ARB indicate is an attainable goal.
3. On Page 18, the ARB identifies the development of a so-called "cap and trade" program as a "central feature" of the overall recommendation contained in the Draft Scoping Plan. I believe that the "central feature" of the Scoping Plan should be achievable "caps," not "trading." A focus on "trading" will likely divert efforts from the primary goal, which is to require ourselves to make every possible reduction we can, at the earliest possible time. The basic problem with a "market" approach to meeting the global warming challenge is that markets are designed to operate as every individual attempts to maximize his or her individual best interest. Global warming is a crisis that confronts us collectively. We are all in this together. Therefore, if there are things which can be done to reduce emissions, our AB 32 program needs to require that they actually be done. A so-called "market" approach suggests that what people ought to do is to search for some way to get someone else to make reductions, so they don't have to. This is not the right message at a time of crisis.
4. I agree with the Environmental Justice Advisory Committee that the ARB should implement a three-pronged approach for addressing greenhouse gases: "(1) adopting standards and regulations; (2) providing incentives; and (3) putting a price on carbon via a carbon fee.

5. Page 25 of the Draft Scoping Plan suggests that "new power plants, both fossil fuel fired and renewable generation, will be a critical part of the state's electricity mix in coming decades." To meet the global warming challenge, we need to stop combusting fossil fuels. A rule prohibiting "new" fossil fuel burning power plants, so that new power plants will meet increased energy demand through renewable generation and conservation, is the kind of response our state should be making to the crisis that we are confronting. A provision could be designed to allow the reconstruction of existing fossil fuel power plants if the reconstructed plant would result in a significant reduction in emissions per unit of power produced.

In my experience, which does include a brief stint as a member of the ARB, one of the great strengths of the Air Resources Board is its deliberative and professional rulemaking process. That professional and scientifically-based approach is clearly visible as the ARB determines how its Climate Change Scoping Plan will be framed.

I urge the Board, as it adopts the Scoping Plan - and even more importantly, as it implements the Scoping Plan - not to let its "deliberative" tradition blind it to the need for dramatic and effective action to reduce greenhouse gas emissions at the earliest possible time, and to the greatest degree possible. Please, in both what you write, and what you do, highlight the sense of urgency that must motivate our efforts.

We shouldn't let ourselves off the hook by passing by any feasible way to reduce greenhouse gas emissions. We shouldn't decide that because we are leading the world in doing something that this is enough. Again, the ARB should be devising and implementing a plan that will actually do what Governor Schwarzenegger said:

"We owe our children and we owe our grandchildren. We simply must do everything in our power to fight global warming before it is too late."

Thank you for taking my comments into account.

Yours truly,

Gary A. Patton

cc: PCL

Attachment: [www.arb.ca.gov/lists/scopingpln08/1650-final\\_scoping\\_plan\\_comment\\_letter\\_to\\_arb\\_-\\_gap.doc](http://www.arb.ca.gov/lists/scopingpln08/1650-final_scoping_plan_comment_letter_to_arb_-_gap.doc)

Original File Name: Final Scoping Plan Comment Letter to ARB - GAP.doc

Date and Time Comment Was Submitted: 2008-12-10 12:02:17

No Duplicates.



**Comment 450 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stephanie

Last Name: Williams

Email Address: stephanie@wsgma.org

Affiliation: Western States Goods Movement All: IWLA

Subject: Scoping Plan

Comment:

Joint Comments from Western States Goods Movement Alliance and the  
International Logistics and Warehousing Association

Attachment: [www.arb.ca.gov/lists/scopingpln08/1651-wsgma\\_joint\\_cover\\_letter\\_scoping\\_plan\\_12-10-08.docx](http://www.arb.ca.gov/lists/scopingpln08/1651-wsgma_joint_cover_letter_scoping_plan_12-10-08.docx)

Original File Name: WSGMA Joint Cover letter scoping plan 12-10-08.docx

Date and Time Comment Was Submitted: 2008-12-10 12:02:42

No Duplicates.

**Comment 451 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: William  
Last Name: Westerfield  
Email Address: amercad@smud.org  
Affiliation: SMUD

Subject: SMUDs Comments of AB 32 Scoping Plan  
Comment:

Comments sent at 11:50 earlier today. This copy is on letterhead.  
The comments, themselves are the same.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1653-smuds\\_arb\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/1653-smuds_arb_scoping_plan_comments.pdf)

Original File Name: Smuds ARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-12-10 12:06:26

No Duplicates.

**Comment 452 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Julie Meier  
Last Name: Wright  
Email Address: cd@sandiegobusiness.org  
Affiliation: (619) 234-8484

Subject: San Diego Regional EDC Scoping Plan Comments  
Comment:

Please find a copy of the San Diego Regional EDC and San Diego Regional Chamber of Commerce letter on scoping plan.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1655-12\\_10\\_08\\_mary\\_nichols\\_carb\\_re\\_ab\\_32\\_implementation.doc](http://www.arb.ca.gov/lists/scopingpln08/1655-12_10_08_mary_nichols_carb_re_ab_32_implementation.doc)

Original File Name: 12 10 08 Mary Nichols CARB re AB 32 Implementation.doc

Date and Time Comment Was Submitted: 2008-12-10 12:10:05

No Duplicates.

**Comment 453 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mike  
Last Name: Overn  
Email Address: [movern@agrium.com](mailto:movern@agrium.com)  
Affiliation:

Subject: Objection to Proposed Rule  
Comment:

CARB -

Kindly review my attached letter in objection to the proposed rule.

Thanks -

Mike

Attachment: [www.arb.ca.gov/lists/scopingpln08/1656-arb\\_letter.doc](http://www.arb.ca.gov/lists/scopingpln08/1656-arb_letter.doc)

Original File Name: ARB Letter.doc

Date and Time Comment Was Submitted: 2008-12-10 12:13:37

No Duplicates.

**Comment 454 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Luke

Last Name: Cole

Email Address: luke@igc.org

Affiliation: Center on Race, Poverty & the Environmt

Subject: AB 32 Scoping Plan Comments

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1657-scoping\\_plan\\_comments\\_-\\_crpe\\_final\\_12-10-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1657-scoping_plan_comments_-_crpe_final_12-10-08.pdf)

Original File Name: Scoping Plan Comments - CRPE final 12-10-08.pdf

Date and Time Comment Was Submitted: 2008-12-10 12:28:19

No Duplicates.

**Comment 455 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: lisa  
Last Name: jacobson  
Email Address: ljacobse@fire.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

Attached is a Comment Letter from CAL FIRE.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1658-carb.pdf](http://www.arb.ca.gov/lists/scopingpln08/1658-carb.pdf)

Original File Name: CARB.pdf

Date and Time Comment Was Submitted: 2008-12-10 12:39:57

No Duplicates.

**Comment 456 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gillian

Last Name: Hayes

Email Address: ghayes@srcity.org

Affiliation: City of Santa Rosa

Subject: AB 32 Scoping Plan comments

Comment:

Please see attached letter....

Attachment: [www.arb.ca.gov/lists/scopingpln08/1660-ab32\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/scopingpln08/1660-ab32_scoping_plan_comments.pdf)

Original File Name: AB32 Scoping Plan comments.pdf

Date and Time Comment Was Submitted: 2008-12-10 14:16:12

No Duplicates.

## **Comment 457 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Timothy  
Last Name: Papandreou  
Email Address: papandreout@metro.net  
Affiliation:

Subject: California Air Resources Board's (CARB) Proposed AB 32 Climate Change Scoping Plan

Comment:

December 9, 2008

Chair Mary Nichols  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chair Nichols, Board Members, and Staff:

The Regional Transportation Planning Agencies (RTPAs) appreciate the opportunity to comment on the California Air Resources Board's (CARB) Proposed AB 32 Climate Change Scoping Plan. California's 43 RTPAs seek to ensure that transportation projects can be successfully implemented that provide the multiple benefits of economic development, improving quality of life and meeting state and federal environmental goals.

While mindful of the previous comments submitted by the RTPAs on August 13th, we would like to bring to your attention to these additional comments for inclusion in the Proposed Scoping Plan.

- Support the securitization of existing funding levels of state transit funding and dedicate new sources to accommodate modal shift. While the Proposed Scoping Plan's overall policy goals support and encourage a shift toward more transit-oriented communities and acknowledges the necessity of a secure source of transit funding, it fails to acknowledge the state's continued raid of transit funding to balance the budget. A significant state role in transit funding is critical to meeting the statutory goals of AB 32 and SB 375 and the need to protect such funding sources should be acknowledged in the plan. Additionally, the plan should acknowledge that a modal shift will place a greater burden on transit systems necessitating a dedicated, secure and sustainable funding source to accommodate this shift.

- Credit for emission reductions achieved through bond funded projects should belong to the local implementing entity. Local jurisdictions are contributing the majority of funding for these transportation projects through local matching funds, in addition to other expenditures for planning, environmental reviews, and engineering. Assigning credit of GHG emission reductions achieved through these projects entirely to the state ignores the role of local agencies in implementing these emission reducing projects and decreases the ability to reach regional GHG targets. The regional



transportation plans analyze the cumulative impact of all land use decisions and transportation projects based upon overall anticipated funding without regard to the funding source and separating out specific projects requires an analysis of what would happen without those projects but must include how the funding that went to those projects would otherwise be spent. Accordingly this policy is unworkable if applied to regional transportation planning. We ask that this be clarified. If this does apply to regional transportation planning, the Plan should consider the option of crediting GHG reductions proportionally based upon the funding contribution of each entity.

The RTPAs look forward to partnering with CARB on implementation of plan. RTPAs representing different areas of the state should be included as key representatives on the Regional Targets Advisory Committee to ensure integrated implementation of the Scoping Plan with the SB 375 process. Through this partnership, the RTPAs hope that a workable framework can be developed whereby the goals of AB 32 and SB 375 can be successfully met and transportation agencies can continue implementing transportation projects efficiently and effectively. Please contact Timothy Papandreou at (213) 922-2281 or Wendy Villa of OCTA at 714-560-5595 if you have any questions.

Sincerely,

Rachel Moriconi  
Moderator 2008/09  
California Regional Transportation Planning Agencies

Attachment: [www.arb.ca.gov/lists/scopingpln08/1661-rtpa\\_comments\\_12-5-08\\_carbscopingplan.pdf](http://www.arb.ca.gov/lists/scopingpln08/1661-rtpa_comments_12-5-08_carbscopingplan.pdf)

Original File Name: RTPA Comments 12-5-08 CARBScopingPlan.pdf

Date and Time Comment Was Submitted: 2008-12-10 14:27:56

No Duplicates.

## **Comment 458 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tom

Last Name: Guilderson

Email Address: tguilder@ucsc.edu

Affiliation:

**Subject: Climate Change Proposed Scoping Plan, Tracking and Measuring Progress**  
**Comment:**

The legislation proposed under the auspices of AB 32 The California Global Warming Solutions Act of 2006, is ground-breaking, progressive and an important step in the right direction towards a national dialog and emissions reduction program in concert with a credible national energy policy. The legislation has been followed up by the recently-released "Climate Change Proposed Scoping Plan, October 2008" which lays out the implementation of AB 32, which is also an important step towards defining the requirements, needs, and methodology to meet the reductions mandated under AB32. However, "Tracking and Measuring Progress" (Section IV-D) is fundamentally flawed in its assumptions and implementation in nearly exclusively relying upon a 'bottom-up' inventorying methods for quantifying and tracking "greenhouse gas" (GHG) emissions. There is a large and extensive scientific literature base which documents that such inventories can be off by factors of two (2) or more. This is the case nationally in the US where the bottom up estimate of SF6 emissions are close to a factor of three (3) lower than what is required to match what is observed in the atmosphere. This single example shares commonality with other estimates of other emissions which show that bottom-up inventories are always biased to UNDERESTIMATING the true emissions. This is the case even when there are not substantial financial incentives and dis-incentives to 'gerrymander' the inventory to meet a specific outcome (eg., when cap and trade, "mitigation" efforts, and "carbon" auctions, each of which carries financial benefits and incentives for specific players, are being combined in the case of AB 32's implementation).

A credible, scientifically defensible estimate of GHG emissions requires additional effort beyond the "Report Card" approaches described in the Scoping Plan. Such methods need to include an analysis of the uncertainties in the GHG emissions, and independent verification of the bottom-up inventories. There is only a brief reference to verification based on atmospheric measurements at the end of the third paragraph in Section IV-D: "Continuous atmospheric monitoring of greenhouse gases may be useful for determining the effectiveness of emission reduction strategies and for future inventory development." Such a statement is ineffective and artificially weak in articulating the true need of such an activity.

In order to add credibility to the Scoping Plan, I strongly recommend that the Air Resources Board include an expanded description on the role of instrumental observations, including but not exclusive to continuous monitoring and discrete whole air sampling and improving verification strategies such as the

combination of observations with modeling (vis a vis "top down inversion" models). Without such a statement the Scoping Plan if implemented as stated will not meet the stated goals and actual progress towards (verified) emissions reductions.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1662-arb\\_scopingcomm.pdf](http://www.arb.ca.gov/lists/scopingpln08/1662-arb_scopingcomm.pdf)

Original File Name: ARB\_ScopingComm.pdf

Date and Time Comment Was Submitted: 2008-12-10 14:33:37

No Duplicates.

## **Comment 459 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Chris  
Last Name: Tooker  
Email Address: ctooker@winfirst.com  
Affiliation: Sacramento LAFCO

Subject: AB 32 Scoping Plan  
Comment:

As a commissioner on the Sacramento Local Agency Formation Commission (LAFCO), I am focused on preventing urban sprawl and its climate change impacts, providing efficient municipal services and protecting the County's remaining agricultural lands and open space. In passing AB 32, the Legislature and the Governor clearly recognized the imperative of effectively addressing climate change NOW in order to assure the vitality of California's future economy and quality of life. Meeting this challenge requires major changes in public policy to assure that the "externalities" so long ignored by our economic system are adequately "internalized". The mythical "free lunches" of the past are behind us. Such changes must reflect, in part, a clear understanding of the relationships between land use, energy use, and climate change. As with the critical national and world-wide economic crisis that we face today, a half-hearted attempt to address climate change is doomed to failure! Fundamental and even difficult changes in the way we grow our communities are needed NOW!

Accordingly, CARB should raise the land use target in the AB 32 Scoping Plan from 5 million metric tons of CO2 equivalent (MMT) to 11-14 MMT. The 5 MMT target is based upon models that are widely acknowledged to underestimate the benefits of dense, mixed-use development, while the higher target is achievable with policies California is already considering. In addition to reducing greenhouse gas emissions, such changes will provide other long term benefits, including more efficient municipal services, energy savings, and preservation of important agricultural lands and open space resources that are critical to our long term economy and quality of life.

Setting a higher target for the land use sector will signal to local governments that establishing new land use patterns is a critical part of the transformation in our economy that is needed to combat global warming. Conversely, a low target will send the signal that business-as-usual development can continue and that someone else will solve the problem.

Chris Tooker  
Public Member Commissioner  
Sacramento LAFCO

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 14:34:21

No Duplicates.

**Comment 460 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: donald

Last Name: manro

Email Address: citizen-aide@clearwire.net

Affiliation: T C Citizens for Responsible Growth

Subject: AB 32 Scoping Plan

Comment:

We strongly encourage you to adopt a higher emission reduction target for the land use sector of the AB 32 Scoping Plan. Standard low density, automobile oriented land use patterns that underlie the state's contribution to the global greenhouse gas emission crisis have also been generating a severe health crisis responsible for more premature deaths than automobile accidents in the San Joaquin Valley.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 16:14:04

No Duplicates.

## **Comment 461 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Don  
Last Name: Wood  
Email Address: dwood8@cox.net  
Affiliation: Pacific Energy Policy Center

Subject: Public Goods Charges on Water Bills  
Comment:

Chairwoman Nichols and Board Members:

We understand that the Scoping Plan calls for significant investments in conservation and recommends a public goods charge on water bills to fund end-use water efficiency improvements, system-wide efficiency projects and water recycling. We completely support this action. The state legislature approved legislation createing public goods charges on gas and electricity bills in the 1980s which have helped fund energy efficiency programs that have saved California energy customers billions of dollars in avoided costs, and helped avoid the need to build dozens of new powerplants costing billions of dollars since the PGC charges were first adopted. We strongly urge the Board to keep water public goods charges as part of our AB 32 implementation plans. Water collection, transmission, distribution and treatment requires 19% of all the energy used in California. Finding more ways to increase water efficiency would help solve the state's energy problems, as well as addressing its water shortage problems.

Thanks for considering these comments.

Don Wood, Sr. Policy Advisor  
Pacific Energy Policy Center  
La Mesa, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 17:30:16

No Duplicates.

**Comment 462 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Karen

Last Name: Sandberg

Email Address: karensandberg@surewest.net

Affiliation:

Subject: Legislative Analysts Office letter dated 11-17-2008 to Hon. Roger Niello  
Comment:

I realize this comment is late - Please read the LAO letter available on the internet - my house has suffered water damage and is in the middle of reconstruction and I am unable to attend the meeting tomorrow and was unable to submit comments regarding the Legislative Analysts Office letter timely -  
The LAO letter comments on inconsistencies and incompleteness of the Scoping Plan - Please do not adopt this Scoping Plan - Please have another public hearing to discuss better alternatives. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 19:06:33

No Duplicates.



## **Comment 463 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Beth  
Last Name: Huning  
Email Address: bhuning@sfbayjv.org  
Affiliation: San Francisco Bay Joint Venture

Subject: AB 32 scoping plan comments  
Comment:

The San Francisco Bay Joint Venture (SFBJV) is a partnership of government agencies, non-profit organizations, business, and landowners working collaborative to protect, restore, and enhance 200,000 acres of wetlands in the San Francisco Bay Area. The SFBJV is one of 18 joint ventures in North America, implementing the North American Wetlands Conservation Act. The SFBJV is particularly concerned about greenhouse gas emissions as they relate to climate change and sea level rise.

Tidal wetlands have been shown to be effective not only for flood control and shoreline protection, but in sequestering carbon. They also provide valuable wildlife habitat mitigate for sea level rises.

Currently SFBJV partners are conducting research in conjunction with the California Climate Action Registry to more accurately measure and assess carbon sequestration in SF Bay tidal wetlands. Additional research and technical assistance is needed to support carbon sequestration, especially with respect to tidal wetlands. There is also a strong need for research to develop protocols for carbon sequestration in wetlands, similar to existing forestry protocols.

It is important that there is a clear policy for guidance on carbon credit/mitigation funding that can be used with other public funding that allow for projects sponsored by the SFBJV to be able to receive funding from multiple sources (i.e. public funding sources - state or federal- and carbon credit/mitigation funding.)

The SFBJV suggests that AB 32 allow for funds generated by carbon credits/mitigation or other carbon revenue generating activities to be used for research and technical assistance to implement projects for adaptation, such as wetland restoration, acquisition.

If you have any questions about the SFBJV or our interest in ensuring that tidal wetlands are considered in AB32 implementation, please feel free to contact me.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 20:06:31

No Duplicates.



**Comment 464 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard  
Last Name: Whipple  
Email Address: rwhipple@cosb.org  
Affiliation: City of Solana Beach

Subject: AB 32 Scoping Plan Public Comments  
Comment:

Dear Honorable Chairperson, CARB Board Members and Clerk Of The Board,

Please accept comments from the City of Solana Beach (Attached) for consideration of Item #08-10-2 "Public Meeting to Consider the Approval of Assembly Bill 32 (AB 32) Scoping Plan to Reduce Greenhouse Gas Emissions in California" to be held at 9:00 am on Thursday December, 11, 2008.

Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1673-carb\\_scoping\\_plan\\_comments\\_-\\_solana\\_beach.pdf](http://www.arb.ca.gov/lists/scopingpln08/1673-carb_scoping_plan_comments_-_solana_beach.pdf)

Original File Name: CARB Scoping Plan Comments - Solana Beach.pdf

Date and Time Comment Was Submitted: 2008-12-10 21:19:56

No Duplicates.

**Comment 465 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ameenah

Last Name: Fuller

Email Address: ameenahfuller4senate@californiamail.com

Affiliation:

Subject: AB 32 Scoping Plan to Reduce Greenhouse Gas Emissions in CA

Comment:

Dear ARB board;

This letter is in support of AB 32 Scoping Plan to Reduce Greenhouse Gas Emissions in California. It is important the state of California in conjunction with the Air Resources Board take appropriate action in short order to implement the approval of AB 32. This is a progressive move in the right direction to reduce Greenhouse gas emissions and promote our environmental policies. It is important California set an example for the nation and become a model on this issue. I will continually support AB 32 for a greener California. The creation of new jobs in green technology is paramount in today's economy. In addition, I support tax incentives for homebuilders that build affordable green homes in the California.

Thank you.

Sincerely,

Ameenah Fuller

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 02:54:07

No Duplicates.

**Comment 466 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lindell

Last Name: Price

Email Address: lprice@walksacramento.org

Affiliation:

Subject: Land Use Reform, and multimodal transportation

Comment:

Place more emphasis on land use reform. Mixed use and compact land use opens the door to multimodal transportation. Stop wasting so much of our valuable land on pavement for driving and parking. To reduce greenhouse gases, let's use more land for trees and plants, and less for pavement for motorvehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 07:22:08

No Duplicates.

## **Comment 467 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gladwyn  
Last Name: d'Souza  
Email Address: godsouza@mac.com  
Affiliation:

Subject: AB32 Scoping plan comments  
Comment:

Dear Chair Nichols:

Thank you for you and your staff's hard work on the Climate Change Scoping Plan. Your plan will shape our states response to global warming over several decades.

As you meet Dec. 11-12 to consider whether to adopt the plan, I hope you take the time to review three key areas: land use, auctions, and offsets.

Land Use: Please consider setting a higher target for land use pollution reduction since changing land-use practices now will reduce sprawl. The goal should be to recycle and reuse existing infrastructure resulting in fossil fuels remaining in the ground. Consider spreading the pricing model from electricity across all areas of fossil fuel use. A sustainable quantity is allowed after which higher prices kick in.

Auctions: Please consider requiring auctions, not giveaways for any and all carbon allowances granted by CARB. A cap and dividend as Hansen has said is important to address equity without which the paradigm doesn't change and nothing works. A working system of Renewable Energy Credits will allow individuals to install solar and create local distributed networks of clean power.

Offsets: Please think about reducing the offsets allowed under this plan. Under the current plan, polluters could rely entirely on offsets in the early years of the program, thus allowing polluters in capped sectors to delay making their own emission reductions until later years, in some cases not until 2018.

Thank you for the strong leadership you have provided and continue to provide as California addresses the pollution that causes global warming.

Sincerely,  
Gladwyn d'Souza  
1473 Sixth Ave, Belmont Ca 94002

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 07:40:11

No Duplicates.

**Comment 468 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ernest

Last Name: Silva

Email Address: esilva@m-w-h.com

Affiliation: Coalition for Adequate School Housing

Subject: Comments on AB 32 Scoping Plan from C.A.S.H.

Comment:

This letter is being hand delivered to the ARB today.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1678-ab32scoping\\_plan1.doc](http://www.arb.ca.gov/lists/scopingpln08/1678-ab32scoping_plan1.doc)

Original File Name: AB32scoping plan1.doc

Date and Time Comment Was Submitted: 2008-12-11 09:28:29

No Duplicates.



**Comment 469 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stephen

Last Name: Burns

Email Address: Non-web submitted comment

Affiliation:

Subject: Chevron

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1687-01.pdf](http://www.arb.ca.gov/lists/scopingpln08/1687-01.pdf)

Original File Name: 01.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:09:50

No Duplicates.

**Comment 470 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Patrick

Last Name: Pratt

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Rancho Mirage

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1688-03.pdf](http://www.arb.ca.gov/lists/scopingpln08/1688-03.pdf)

Original File Name: 03.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:13:21

No Duplicates.

**Comment 471 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tilly

Last Name: Chang

Email Address: Non-web submitted comment

Affiliation:

Subject: San Francisco County Transportation Authority

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1689-04.pdf](http://www.arb.ca.gov/lists/scopingpln08/1689-04.pdf)

Original File Name: 04.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:14:10

No Duplicates.

**Comment 472 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ellen

Last Name: Tauscher

Email Address: Non-web submitted comment

Affiliation:

Subject: Congress of the United States- House of Representatives

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1690-05.pdf](http://www.arb.ca.gov/lists/scopingpln08/1690-05.pdf)

Original File Name: 05.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:16:01

No Duplicates.

**Comment 473 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Harrison

Email Address: Non-web submitted comment

Affiliation:

Subject: Office of the Mayor- City of Redlands

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1691-06.pdf](http://www.arb.ca.gov/lists/scopingpln08/1691-06.pdf)

Original File Name: 06.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:17:11

No Duplicates.

**Comment 474 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: David

Last Name: Rudat

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Los Alamitos

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1692-07.pdf](http://www.arb.ca.gov/lists/scopingpln08/1692-07.pdf)

Original File Name: 07.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:19:53

No Duplicates.

**Comment 475 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Bill

Last Name: Bisaha

Email Address: Non-web submitted comment

Affiliation:

Subject: Servpro of Tustin

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1693-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1693-08.pdf)

Original File Name: 08.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:21:16

No Duplicates.

**Comment 476 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Cheryl

Last Name: Brothers

Email Address: Non-web submitted comment

Affiliation:

Subject: Orange County Council of Governments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1694-09.pdf](http://www.arb.ca.gov/lists/scopingpln08/1694-09.pdf)

Original File Name: 09.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:23:05

No Duplicates.



**Comment 477 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Doran

Last Name: Barnes

Email Address: Non-web submitted comment

Affiliation:

Subject: Foothill Transit- We Drive

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1695-10.pdf](http://www.arb.ca.gov/lists/scopingpln08/1695-10.pdf)

Original File Name: 10.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:37:20

No Duplicates.

**Comment 478 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Marcell

Last Name: Engstrom

Email Address: Non-web submitted comment

Affiliation:

Subject: R&R Customs- Small Business Owner

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1696-11.pdf](http://www.arb.ca.gov/lists/scopingpln08/1696-11.pdf)

Original File Name: 11.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:38:12

No Duplicates.

**Comment 479 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mike

Last Name: Kerns

Email Address: Non-web submitted comment

Affiliation:

Subject: Sonoma County Board of Supervisors

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1697-12.pdf](http://www.arb.ca.gov/lists/scopingpln08/1697-12.pdf)

Original File Name: 12.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:39:28

No Duplicates.

**Comment 480 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael

Last Name: Lang

Email Address: Non-web submitted comment

Affiliation:

Subject: Coast Fabrication, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1698-13.pdf](http://www.arb.ca.gov/lists/scopingpln08/1698-13.pdf)

Original File Name: 13.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:40:01

No Duplicates.

**Comment 481 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ellie

Last Name: Wooten

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Merced

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1699-14.pdf](http://www.arb.ca.gov/lists/scopingpln08/1699-14.pdf)

Original File Name: 14.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:40:43

No Duplicates.

**Comment 482 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Paul

Last Name: Meyer

Email Address: Non-web submitted comment

Affiliation:

Subject: American Council of Engineering Companies

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1700-16.pdf](http://www.arb.ca.gov/lists/scopingpln08/1700-16.pdf)

Original File Name: 16.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:41:16

No Duplicates.

**Comment 483 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Tim

Last Name: Traver

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Arvin

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1701-17.pdf](http://www.arb.ca.gov/lists/scopingpln08/1701-17.pdf)

Original File Name: 17.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:41:58

No Duplicates.

**Comment 484 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Pastore

Email Address: Non-web submitted comment

Affiliation:

Subject: Southern California Alliance of Publicly Owned Treatment Works

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1702-18.pdf](http://www.arb.ca.gov/lists/scopingpln08/1702-18.pdf)

Original File Name: 18.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:45:47

No Duplicates.



**Comment 485 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Douglas

Last Name: Crane

Email Address: Non-web submitted comment

Affiliation:

Subject: Society in Favor of Depopulating California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1703-19.pdf](http://www.arb.ca.gov/lists/scopingpln08/1703-19.pdf)

Original File Name: 19.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:47:47

No Duplicates.

**Comment 486 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Stephen

Last Name: Finnegan

Email Address: Non-web submitted comment

Affiliation:

Subject: Automobile Club of Souther California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1704-20.pdf](http://www.arb.ca.gov/lists/scopingpln08/1704-20.pdf)

Original File Name: 20.pdf

Date and Time Comment Was Submitted: 2008-12-18 10:49:14

No Duplicates.

**Comment 487 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sarah

Last Name: Gurney

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Sebastopol

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1705-21.pdf](http://www.arb.ca.gov/lists/scopingpln08/1705-21.pdf)

Original File Name: 21.pdf

Date and Time Comment Was Submitted: 2008-12-18 16:17:16

No Duplicates.

**Comment 488 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Pamela

Last Name: Torliatt

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area Air Quality

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1706-22.pdf](http://www.arb.ca.gov/lists/scopingpln08/1706-22.pdf)

Original File Name: 22.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:30:47

No Duplicates.

**Comment 489 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: David

Last Name: Tyson

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Eureka

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1708-23.pdf](http://www.arb.ca.gov/lists/scopingpln08/1708-23.pdf)

Original File Name: 23.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:38:06

No Duplicates.

**Comment 490 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: J.P.

Last Name: Cativiela

Email Address: Non-web submitted comment

Affiliation:

Subject: Community Alliance for Responsible Environmental Stewardship

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1710-24.pdf](http://www.arb.ca.gov/lists/scopingpln08/1710-24.pdf)

Original File Name: 24.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:40:19

No Duplicates.

**Comment 491 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Robert

Last Name: Lieber

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Albany

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1711-25.pdf](http://www.arb.ca.gov/lists/scopingpln08/1711-25.pdf)

Original File Name: 25.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:42:08

No Duplicates.

**Comment 492 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Linda

Last Name: Best

Email Address: Non-web submitted comment

Affiliation:

Subject: Contra Costa Council

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1712-26.pdf](http://www.arb.ca.gov/lists/scopingpln08/1712-26.pdf)

Original File Name: 26.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:42:38

No Duplicates.



**Comment 493 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Suzanne

Last Name: Beers

Email Address: Non-web submitted comment

Affiliation:

Subject: Re; Keep the AB 32 Scoping Plan Strong!

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1713-27.pdf](http://www.arb.ca.gov/lists/scopingpln08/1713-27.pdf)

Original File Name: 27.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:46:53

No Duplicates.

**Comment 494 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Scott

Last Name: Nelson

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Placentia

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1714-28.pdf](http://www.arb.ca.gov/lists/scopingpln08/1714-28.pdf)

Original File Name: 28.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:47:18

No Duplicates.

**Comment 495 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: John

Last Name: Jaquess

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Highlands

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1715-29.pdf](http://www.arb.ca.gov/lists/scopingpln08/1715-29.pdf)

Original File Name: 29.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:48:35

No Duplicates.

**Comment 496 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Rebecca

Last Name: Sutton

Email Address: Non-web submitted comment

Affiliation:

Subject: Environmental Working Group

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1716-30.pdf](http://www.arb.ca.gov/lists/scopingpln08/1716-30.pdf)

Original File Name: 30.pdf

Date and Time Comment Was Submitted: 2008-12-19 09:49:05

No Duplicates.

**Comment 497 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Matthew

Last Name: Mahood

Email Address: Non-web submitted comment

Affiliation:

Subject: Metro Chamber

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1722-34.pdf](http://www.arb.ca.gov/lists/scopingpln08/1722-34.pdf)

Original File Name: 34.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:04:08

No Duplicates.

**Comment 498 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sid

Last Name: Abma

Email Address: Non-web submitted comment

Affiliation:

Subject: Sidel Systems U.S.A. Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1723-33.pdf](http://www.arb.ca.gov/lists/scopingpln08/1723-33.pdf)

Original File Name: 33.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:06:36

No Duplicates.

**Comment 499 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Albert

Last Name: Boro

Email Address: Non-web submitted comment

Affiliation:

Subject: City of San Rafael

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1724-35.pdf](http://www.arb.ca.gov/lists/scopingpln08/1724-35.pdf)

Original File Name: 35.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:07:58

No Duplicates.

**Comment 500 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Ann

Last Name: Egan

Email Address: Non-web submitted comment

Affiliation:

Subject: Private Citizen- Against Global Warming Premise

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1725-36.pdf](http://www.arb.ca.gov/lists/scopingpln08/1725-36.pdf)

Original File Name: 36.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:08:58

No Duplicates.



**Comment 501 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Louis

Last Name: Domessa

Email Address: Non-web submitted comment

Affiliation:

Subject: Private Citizen

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1726-37.pdf](http://www.arb.ca.gov/lists/scopingpln08/1726-37.pdf)

Original File Name: 37.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:10:14

No Duplicates.

**Comment 502 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Carol

Last Name: Schatz

Email Address: Non-web submitted comment

Affiliation:

Subject: Central City Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1727-38.pdf](http://www.arb.ca.gov/lists/scopingpln08/1727-38.pdf)

Original File Name: 38.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:11:18

No Duplicates.

**Comment 503 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Scott

Last Name: Andreson

Email Address: Non-web submitted comment

Affiliation:

Subject: The Industrial Association, Inc. of Contra Costa County

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1728-39.pdf](http://www.arb.ca.gov/lists/scopingpln08/1728-39.pdf)

Original File Name: 39.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:13:18

No Duplicates.

**Comment 504 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: C.L.

Last Name: Sathos

Email Address: Non-web submitted comment

Affiliation:

Subject: Department of the Navy

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1729-40.pdf](http://www.arb.ca.gov/lists/scopingpln08/1729-40.pdf)

Original File Name: 40.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:14:14

No Duplicates.

**Comment 505 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Gregory

Last Name: Adams

Email Address: Non-web submitted comment

Affiliation:

Subject: County Sanitation Districts of Los Angeles County

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1730-41.pdf](http://www.arb.ca.gov/lists/scopingpln08/1730-41.pdf)

Original File Name: 41.pdf

Date and Time Comment Was Submitted: 2008-12-19 10:15:22

No Duplicates.

**Comment 506 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Shelly

Last Name: Sullivan

Email Address: Non-web submitted comment

Affiliation:

Subject: AB 32 Implementation Group

Comment:

DVD of Constituents Comments on the AB 32 Scoping Plan. Copy of DVD located in the December 2008 Board Book.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-20 10:55:48

No Duplicates.

**Comment 507 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lee

Last Name: Harrington

Email Address: Non-web submitted comment

Affiliation:

Subject: Southern California Leadership Council

Comment:

Binder of from Southern California Leadership Council. Binder contains testimony of Lee Harrington, SCLC's Proposed Plan Comments (November 4, 2008), SCLC's Draft Plan Comments (July 3, 2008), and an AB 32 Report. Original binder submitted is located in the December Board Book.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-20 11:14:25

No Duplicates.

**Comment 508 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Angela

Last Name: Johnson Meszaros

Email Address: Non-web submitted comment

Affiliation:

Subject: Environmental Justice Advisory Committee

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1745-12\\_11\\_08\\_proposed\\_plan\\_-\\_ejac\\_comments\\_final.pdf](http://www.arb.ca.gov/lists/scopingpln08/1745-12_11_08_proposed_plan_-_ejac_comments_final.pdf)

Original File Name: 12\_11\_08\_Proposed Plan - EJAC Comments FINAL.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:17:16

No Duplicates.



**Comment 509 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Josh

Last Name: Margolis

Email Address: Non-web submitted comment

Affiliation:

Subject: CantorCO2e

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1746-cantorco2e.pdf](http://www.arb.ca.gov/lists/scopingpln08/1746-cantorco2e.pdf)

Original File Name: CantorCO2e.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:19:01

No Duplicates.

## **Comment 510 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Richard  
Last Name: Robinson  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Pollock Fishing Rules  
Comment:

First Name: Richard  
Last Name: Robinson  
EMail Address: RbnsnBkpkkr@sbcglobal.net  
Phone Number:  
Affiliation:

Subject: Pollock fishing rules  
Comment:

It has come to my attention that the eastern Bering Sea pollock stock appears to have declined 50% since last year. This is particularly alarming due to the vital role that pollock plays in the Bering Sea ecosystem, as a food source for depleted fur seals and endangered Steller sea lions.

When you meet in December, I urge you to set a catch limit that will reverse the decline of pollock stocks and provide for the needs for all species that depend on pollock as their prey. Rebuilding pollock stocks will serve the long term interests of Alaska's fishing industry and coastal communities.

I also urge you to suspend the roe fishery. With pollock stocks in trouble, it makes no sense to deliberately take tons of pregnant females before they release their eggs.

In general, a more precautionary, ecosystem-based approach is needed to prevent declines of this nature. Marine reserves are a valuable tool to enable degraded habitats to recover, and to rebuild fish populations. They can also serve as experimental controls which help increase understanding of the impacts of climate change.

Decisive action is needed now to prevent one of the largest fisheries collapses in history, with far reaching ecological and economic implications.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-20 11:23:22

No Duplicates.

**Comment 511 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Sidney

Last Name: Sigleton

Email Address: Non-web submitted comment

Affiliation:

Subject: Wincentive Corporation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1748-scop0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/1748-scop0001.pdf)

Original File Name: scop0001.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:33:30

No Duplicates.

**Comment 512 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Darren

Last Name: Stroud

Email Address: Non-web submitted comment

Affiliation:

Subject: Valero

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1749-01.pdf](http://www.arb.ca.gov/lists/scopingpln08/1749-01.pdf)

Original File Name: 01.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:51:09

No Duplicates.

**Comment 513 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Patrick

Last Name: Strader

Email Address: Non-web submitted comment

Affiliation:

Subject: Starpointe Ventures

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1750-02.pdf](http://www.arb.ca.gov/lists/scopingpln08/1750-02.pdf)

Original File Name: 02.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:52:45

No Duplicates.

**Comment 514 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Suzanne

Last Name: Smith

Email Address: Non-web submitted comment

Affiliation:

Subject: Sonoma County Transportation Authority

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1751-03.pdf](http://www.arb.ca.gov/lists/scopingpln08/1751-03.pdf)

Original File Name: 03.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:53:34

No Duplicates.

**Comment 515 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: James

Last Name: Camp

Email Address: Non-web submitted comment

Affiliation:

Subject: Voit Development Company

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1752-04.pdf](http://www.arb.ca.gov/lists/scopingpln08/1752-04.pdf)

Original File Name: 04.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:54:28

No Duplicates.



**Comment 516 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Glenn

Last Name: Steiger

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Glendale

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1753-05.pdf](http://www.arb.ca.gov/lists/scopingpln08/1753-05.pdf)

Original File Name: 05.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:55:01

No Duplicates.

**Comment 517 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lynda

Last Name: Lang

Email Address: Non-web submitted comment

Affiliation:

Subject: Carpinteria Valley Chamber of Commerce

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1754-06.pdf](http://www.arb.ca.gov/lists/scopingpln08/1754-06.pdf)

Original File Name: 06.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:55:34

No Duplicates.

**Comment 518 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Mike

Last Name: Riley

Email Address: Non-web submitted comment

Affiliation:

Subject: Riley Electric Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1755-07.pdf](http://www.arb.ca.gov/lists/scopingpln08/1755-07.pdf)

Original File Name: 07.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:56:02

No Duplicates.

**Comment 519 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Michael

Last Name: Cunneen

Email Address: Non-web submitted comment

Affiliation:

Subject: Signet Products, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1758-scoping0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/1758-scoping0001.pdf)

Original File Name: scoping0001.pdf

Date and Time Comment Was Submitted: 2009-01-09 10:15:06

No Duplicates.

**Comment 520 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Lorie

Last Name: Mead

Email Address: Non-web submitted comment

Affiliation:

Subject: Mead Automotive & RV Repair

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1759-scoping0002.pdf](http://www.arb.ca.gov/lists/scopingpln08/1759-scoping0002.pdf)

Original File Name: scoping0002.pdf

Date and Time Comment Was Submitted: 2009-01-09 10:25:16

No Duplicates.

**Comment 521 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Troy

Last Name: Robertson

Email Address: Non-web submitted comment

Affiliation:

Subject: Conway

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1760-scopinggd0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/1760-scopinggd0001.pdf)

Original File Name: scopinggd0001.pdf

Date and Time Comment Was Submitted: 2009-01-09 10:52:04

No Duplicates.

**Comment 522 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Greg

Last Name: Kerras

Email Address: Non-web submitted comment

Affiliation:

Subject: Communities for a Better Environment

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1761-cbe.pdf](http://www.arb.ca.gov/lists/scopingpln08/1761-cbe.pdf)

Original File Name: cbe.pdf

Date and Time Comment Was Submitted: 2009-01-09 10:52:57

No Duplicates.

**Comment 523 for AB 32 Scoping Plan (scopingpln08) - 45 Day.**

First Name: Paul

Last Name: Heliker

Email Address: Non-web submitted comment

Affiliation:

Subject: Marin Municipal Water District

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/truckbus08/946-paul\\_heliker.pdf](http://www.arb.ca.gov/lists/truckbus08/946-paul_heliker.pdf)

Original File Name: Paul Heliker.pdf

Date and Time Comment Was Submitted: 2008-12-20 11:41:32

No Duplicates.



## **Comment 1 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Hank

Last Name: Ryan

Email Address: Non-web submitted comment

Affiliation:

Subject: Small Business California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/776-1.pdf](http://www.arb.ca.gov/lists/scopingpln08/776-1.pdf)

Original File Name: 1.pdf

Date and Time Comment Was Submitted: 2008-11-25 09:40:56

No Duplicates.

**Comment 2 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Charlotte

Last Name: Myers

Email Address: Non-web submitted comment

Affiliation:

Subject: California Interfaith Power and Light

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/777-3.pdf](http://www.arb.ca.gov/lists/scopingpln08/777-3.pdf)

Original File Name: 3.pdf

Date and Time Comment Was Submitted: 2008-11-25 09:43:48

No Duplicates.

### **Comment 3 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Betsy

Last Name: Reifsnider

Email Address: Non-web submitted comment

Affiliation:

Subject: Catholic Charities Diocese of Stockton

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/778-4.pdf](http://www.arb.ca.gov/lists/scopingpln08/778-4.pdf)

Original File Name: 4.pdf

Date and Time Comment Was Submitted: 2008-11-25 09:45:33

No Duplicates.

## **Comment 4 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Danielle

Last Name: Osborn Mills

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments of the Center for Energy Efficiency and Renewable Technologies  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/779-5.pdf](http://www.arb.ca.gov/lists/scopingpln08/779-5.pdf)

Original File Name: 5.pdf

Date and Time Comment Was Submitted: 2008-11-25 09:48:50

No Duplicates.

**Comment 5 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Angela

Last Name: Johnson Meszaros

Email Address: Non-web submitted comment

Affiliation:

Subject: Climate Change and the Proposed Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/781-aa.pdf](http://www.arb.ca.gov/lists/scopingpln08/781-aa.pdf)

Original File Name: aa.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:13:45

No Duplicates.

## **Comment 6 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Bud

Last Name: Beebe

Email Address: Non-web submitted comment

Affiliation:

Subject: The Sacramento Municipal Utility District

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/782-7.pdf](http://www.arb.ca.gov/lists/scopingpln08/782-7.pdf)

Original File Name: 7.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:15:09

No Duplicates.

**Comment 7 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Susan

Last Name: Strong

Email Address: Non-web submitted comment

Affiliation:

Subject: American Chemistry Council

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/783-8.pdf](http://www.arb.ca.gov/lists/scopingpln08/783-8.pdf)

Original File Name: 8.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:16:03

No Duplicates.

## **Comment 8 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Beverly

Last Name: Alkire

Email Address: Non-web submitted comment

Affiliation:

Subject: Green Consultants

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/784-9.pdf](http://www.arb.ca.gov/lists/scopingpln08/784-9.pdf)

Original File Name: 9.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:17:13

No Duplicates.



**Comment 9 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Lee

Last Name: Harrington

Email Address: Non-web submitted comment

Affiliation:

Subject: Southern California Leadership Council

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/785-10.pdf](http://www.arb.ca.gov/lists/scopingpln08/785-10.pdf)

Original File Name: 10.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:18:14

No Duplicates.

**Comment 10 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Mike

Last Name: Zuckerman

Email Address: Non-web submitted comment

Affiliation:

Subject: Zen Compound LLC/ Temple Nightclub

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/787-11.pdf](http://www.arb.ca.gov/lists/scopingpln08/787-11.pdf)

Original File Name: 11.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:19:45

No Duplicates.

**Comment 11 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Andrew

Last Name: Michael

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area Council

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/788-12.pdf](http://www.arb.ca.gov/lists/scopingpln08/788-12.pdf)

Original File Name: 12.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:20:29

No Duplicates.

**Comment 12 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: James

Last Name: Duran

Email Address: Non-web submitted comment

Affiliation:

Subject: A Report of the Heritage Center for Data Analysis

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/789-13.pdf](http://www.arb.ca.gov/lists/scopingpln08/789-13.pdf)

Original File Name: 13.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:22:08

No Duplicates.

**Comment 13 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Kari

Last Name: Smith

Email Address: Non-web submitted comment

Affiliation:

Subject: SunPower Corporation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/790-14.pdf](http://www.arb.ca.gov/lists/scopingpln08/790-14.pdf)

Original File Name: 14.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:26:12

No Duplicates.

**Comment 14 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Scott

Last Name: Smithline

Email Address: Non-web submitted comment

Affiliation:

Subject: Re: Mandatory Commercial Recycling AB32 Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/791-15.pdf](http://www.arb.ca.gov/lists/scopingpln08/791-15.pdf)

Original File Name: 15.pdf

Date and Time Comment Was Submitted: 2008-11-25 10:58:33

No Duplicates.

**Comment 15 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Scott

Last Name: Rayomd

Email Address: Non-web submitted comment

Affiliation:

Subject: Finelite

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/792-16.pdf](http://www.arb.ca.gov/lists/scopingpln08/792-16.pdf)

Original File Name: 16.pdf

Date and Time Comment Was Submitted: 2008-11-25 11:00:42

No Duplicates.

**Comment 16 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Allen

Last Name: Lloyd

Email Address: Non-web submitted comment

Affiliation:

Subject: California Business Letter to ARB in Support of the Proposed Scoping Plan  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/793-17.pdf](http://www.arb.ca.gov/lists/scopingpln08/793-17.pdf)

Original File Name: 17.pdf

Date and Time Comment Was Submitted: 2008-11-25 11:10:32

No Duplicates.



**Comment 17 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Sarah

Last Name: Skikine

Email Address: Non-web submitted comment

Affiliation:

Subject: The Climate Group

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/794-18.pdf](http://www.arb.ca.gov/lists/scopingpln08/794-18.pdf)

Original File Name: 18.pdf

Date and Time Comment Was Submitted: 2008-11-25 11:14:01

No Duplicates.

**Comment 18 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Buddy

Last Name: Burke

Email Address: Non-web submitted comment

Affiliation:

Subject: Republicans for Environmental Protection

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/795-19.pdf](http://www.arb.ca.gov/lists/scopingpln08/795-19.pdf)

Original File Name: 19.pdf

Date and Time Comment Was Submitted: 2008-11-25 11:15:40

No Duplicates.

**Comment 19 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Elliot

Last Name: Hoffman

Email Address: Non-web submitted comment

Affiliation:

Subject: New Voices for Business

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/796-20.pdf](http://www.arb.ca.gov/lists/scopingpln08/796-20.pdf)

Original File Name: 20.pdf

Date and Time Comment Was Submitted: 2008-11-25 11:17:20

No Duplicates.

## **Comment 20 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Chris

Last Name: Erikson

Email Address: Non-web submitted comment

Affiliation:

Subject: Climate Earth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/803-climateearth0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/803-climateearth0001.pdf)

Original File Name: climateearth0001.pdf

Date and Time Comment Was Submitted: 2008-11-25 13:24:04

No Duplicates.

**Comment 21 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Betty Jo

Last Name: Toccoli

Email Address: Non-web submitted comment

Affiliation:

Subject: Total One Development Center

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/804-22.pdf](http://www.arb.ca.gov/lists/scopingpln08/804-22.pdf)

Original File Name: 22.pdf

Date and Time Comment Was Submitted: 2008-11-25 13:24:51

No Duplicates.

**Comment 22 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Bonni

Last Name: Holmes-Gen

Email Address: Non-web submitted comment

Affiliation:

Subject: Re: Proposed Global Warming Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/807-230001.pdf](http://www.arb.ca.gov/lists/scopingpln08/807-230001.pdf)

Original File Name: 230001.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:10:05

No Duplicates.

**Comment 23 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Linda

Last Name: Weiner

Email Address: Non-web submitted comment

Affiliation:

Subject: Scoping Plan Comments: Linda Weiner

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/808-24.pdf](http://www.arb.ca.gov/lists/scopingpln08/808-24.pdf)

Original File Name: 24.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:11:09

No Duplicates.

**Comment 24 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Teri

Last Name: Duarte

Email Address: Non-web submitted comment

Affiliation:

Subject: Testimony of AB32 Final Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/809-25.pdf](http://www.arb.ca.gov/lists/scopingpln08/809-25.pdf)

Original File Name: 25.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:11:57

No Duplicates.



**Comment 25 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Michael

Last Name: Dorsey

Email Address: Non-web submitted comment

Affiliation:

Subject: Testimony of Dr. Michael Dorsey, Dartmouth College

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/810-26.pdf](http://www.arb.ca.gov/lists/scopingpln08/810-26.pdf)

Original File Name: 26.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:13:23

No Duplicates.

## **Comment 26 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Robert

Last Name: Johnston

Email Address: Non-web submitted comment

Affiliation:

Subject: Robert A. Johnston, Professor, UC Davis

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/811-27.pdf](http://www.arb.ca.gov/lists/scopingpln08/811-27.pdf)

Original File Name: 27.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:15:28

No Duplicates.

**Comment 27 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Judy

Last Name: Pike

Email Address: Non-web submitted comment

Affiliation:

Subject: Judy Price- Director, Sustainability and Supply Management

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/813-28.pdf](http://www.arb.ca.gov/lists/scopingpln08/813-28.pdf)

Original File Name: 28.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:17:35

No Duplicates.

**Comment 28 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Robert

Last Name: Meacher

Email Address: Non-web submitted comment

Affiliation:

Subject: Board of Supervisors

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/814-30.pdf](http://www.arb.ca.gov/lists/scopingpln08/814-30.pdf)

Original File Name: 30.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:25:40

No Duplicates.

**Comment 29 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: David

Last Name: Wright

Email Address: Non-web submitted comment

Affiliation:

Subject: David Wright- Proposed Scoping Plan Recommendations

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/815-31.pdf](http://www.arb.ca.gov/lists/scopingpln08/815-31.pdf)

Original File Name: 31.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:26:49

No Duplicates.

**Comment 30 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Alexandra

Last Name: Destler

Email Address: Non-web submitted comment

Affiliation:

Subject: Public Health Institute

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/816-32.pdf](http://www.arb.ca.gov/lists/scopingpln08/816-32.pdf)

Original File Name: 32.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:27:56

No Duplicates.

**Comment 31 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: James

Last Name: Watson

Email Address: Non-web submitted comment

Affiliation:

Subject: Environmental Justice Working Group

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/817-33.pdf](http://www.arb.ca.gov/lists/scopingpln08/817-33.pdf)

Original File Name: 33.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:31:37

No Duplicates.

**Comment 32 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Diane

Last Name: Takvorian

Email Address: Non-web submitted comment

Affiliation:

Subject: Environmental Health Coalition

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/818-34.pdf](http://www.arb.ca.gov/lists/scopingpln08/818-34.pdf)

Original File Name: 34.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:34:25

No Duplicates.



**Comment 33 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Vania

Last Name: Ahmadi

Email Address: Non-web submitted comment

Affiliation:

Subject: Healthy 880 Communities

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/819-35.pdf](http://www.arb.ca.gov/lists/scopingpln08/819-35.pdf)

Original File Name: 35.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:38:19

No Duplicates.

**Comment 34 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Blake

Last Name: Simmons

Email Address: Non-web submitted comment

Affiliation:

Subject: Energy Systems Department

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/820-36.pdf](http://www.arb.ca.gov/lists/scopingpln08/820-36.pdf)

Original File Name: 36.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:39:20

No Duplicates.

**Comment 35 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: James

Last Name: Fine

Email Address: Non-web submitted comment

Affiliation:

Subject: Environmental Defense Fund

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/822-37.pdf](http://www.arb.ca.gov/lists/scopingpln08/822-37.pdf)

Original File Name: 37.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:42:01

No Duplicates.

**Comment 36 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Trisha

Last Name: Roth

Email Address: Non-web submitted comment

Affiliation:

Subject: Trisha Roth, MD Comments for AB 32 Proposed Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/823-38.pdf](http://www.arb.ca.gov/lists/scopingpln08/823-38.pdf)

Original File Name: 38.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:43:16

No Duplicates.

**Comment 37 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Erin

Last Name: Rogers

Email Address: Non-web submitted comment

Affiliation:

Subject: Statement in Support of the Effective Limits on Offsets for Reducing Global Warming  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/824-39.pdf](http://www.arb.ca.gov/lists/scopingpln08/824-39.pdf)

Original File Name: 39.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:44:11

No Duplicates.

**Comment 38 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Chris

Last Name: Busch

Email Address: Non-web submitted comment

Affiliation:

Subject: Re: Climate Change Proposed Scoping Plan

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/825-40.pdf](http://www.arb.ca.gov/lists/scopingpln08/825-40.pdf)

Original File Name: 40.pdf

Date and Time Comment Was Submitted: 2008-11-25 14:44:53

No Duplicates.

## **Comment 39 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Californians Against

Last Name: NA

Email Address: Non-web submitted comment

Affiliation:

Subject: Californians Against Wate (See Message)

Comment:

Californians Against Waste, Center for Biological Diversity,  
Natural Resources Defense Council, Sierra Club, The Nature  
Conservancy, and the Wilderness Society.

Attachment: [www.arb.ca.gov/lists/scopingpln08/850-01.pdf](http://www.arb.ca.gov/lists/scopingpln08/850-01.pdf)

Original File Name: 01.pdf

Date and Time Comment Was Submitted: 2008-12-01 12:41:51

No Duplicates.

**Comment 40 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Linda

Last Name: Geringer

Email Address: Non-web submitted comment

Affiliation:

Subject: Kerman Chamber of Commerce

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/852-02.pdf](http://www.arb.ca.gov/lists/scopingpln08/852-02.pdf)

Original File Name: 02.pdf

Date and Time Comment Was Submitted: 2008-12-01 12:55:42

No Duplicates.



**Comment 41 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Seyed

Last Name: Sedredin

Email Address: Non-web submitted comment

Affiliation:

Subject: San Joaquin Valley Air Pollution Control District

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/853-03.pdf](http://www.arb.ca.gov/lists/scopingpln08/853-03.pdf)

Original File Name: 03.pdf

Date and Time Comment Was Submitted: 2008-12-01 12:57:35

No Duplicates.

**Comment 42 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Dave

Last Name: Jones

Email Address: Non-web submitted comment

Affiliation:

Subject: Assemble California Legislature

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/854-04.pdf](http://www.arb.ca.gov/lists/scopingpln08/854-04.pdf)

Original File Name: 04.pdf

Date and Time Comment Was Submitted: 2008-12-01 12:58:30

No Duplicates.

**Comment 43 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Bruce

Last Name: Walker

Email Address: Non-web submitted comment

Affiliation:

Subject: Walker Corporation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/855-05.pdf](http://www.arb.ca.gov/lists/scopingpln08/855-05.pdf)

Original File Name: 05.pdf

Date and Time Comment Was Submitted: 2008-12-01 12:59:08

No Duplicates.

**Comment 44 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Margo

Last Name: Brown

Email Address: Non-web submitted comment

Affiliation:

Subject: California Integrated Waste Management Board

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/856-06.pdf](http://www.arb.ca.gov/lists/scopingpln08/856-06.pdf)

Original File Name: 06.pdf

Date and Time Comment Was Submitted: 2008-12-01 12:59:50

No Duplicates.

**Comment 45 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: George

Last Name: Waidelich

Email Address: Non-web submitted comment

Affiliation:

Subject: Safeway

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/857-07.pdf](http://www.arb.ca.gov/lists/scopingpln08/857-07.pdf)

Original File Name: 07.pdf

Date and Time Comment Was Submitted: 2008-12-01 13:01:01

No Duplicates.

**Comment 46 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Sierra Club Californ

Last Name: NA

Email Address: Non-web submitted comment

Affiliation:

Subject: Sierra Club California

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/858-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/858-08.pdf)

Original File Name: 08.pdf

Date and Time Comment Was Submitted: 2008-12-01 13:04:58

No Duplicates.

**Comment 47 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: John

Last Name: Kabateck

Email Address: Non-web submitted comment

Affiliation:

Subject: Re: Small Business Comments on AB 32 Proposed Scoping Plan  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/860-10.pdf](http://www.arb.ca.gov/lists/scopingpln08/860-10.pdf)

Original File Name: 10.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:16:41

No Duplicates.

**Comment 48 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Stan

Last Name: Dixon

Email Address: Non-web submitted comment

Affiliation:

Subject: Board of Forestry and Fire Protection

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/861-11.pdf](http://www.arb.ca.gov/lists/scopingpln08/861-11.pdf)

Original File Name: 11.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:20:54

No Duplicates.



**Comment 49 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Shayne

Last Name: Law

Email Address: Non-web submitted comment

Affiliation:

Subject: SQB Natural Beverage Leader

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/862-12.pdf](http://www.arb.ca.gov/lists/scopingpln08/862-12.pdf)

Original File Name: 12.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:22:15

No Duplicates.

**Comment 50 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Ronald

Last Name: Stearn

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Sonora

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/863-13.pdf](http://www.arb.ca.gov/lists/scopingpln08/863-13.pdf)

Original File Name: 13.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:31:46

No Duplicates.

**Comment 51 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Dennis

Last Name: Lujan

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Selma

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/865-14.pdf](http://www.arb.ca.gov/lists/scopingpln08/865-14.pdf)

Original File Name: 14.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:55:35

No Duplicates.

**Comment 52 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Richard

Last Name: Dixon

Email Address: Non-web submitted comment

Affiliation:

Subject: Association of Governments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/866-15.pdf](http://www.arb.ca.gov/lists/scopingpln08/866-15.pdf)

Original File Name: 15.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:57:24

No Duplicates.

**Comment 53 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Greg

Last Name: Nyhoff

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Modesto

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/867-16.pdf](http://www.arb.ca.gov/lists/scopingpln08/867-16.pdf)

Original File Name: 16.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:57:59

No Duplicates.

**Comment 54 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Eric

Last Name: Bever

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Costa Mesa

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/868-17.pdf](http://www.arb.ca.gov/lists/scopingpln08/868-17.pdf)

Original File Name: 17.pdf

Date and Time Comment Was Submitted: 2008-12-01 14:59:09

No Duplicates.

**Comment 55 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Lisa

Last Name: Novotny

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Lakewood

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/869-18.pdf](http://www.arb.ca.gov/lists/scopingpln08/869-18.pdf)

Original File Name: 18.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:00:00

No Duplicates.

**Comment 56 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Henry

Last Name: Gardner

Email Address: Non-web submitted comment

Affiliation:

Subject: Association of Bay Area Governments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/870-19.pdf](http://www.arb.ca.gov/lists/scopingpln08/870-19.pdf)

Original File Name: 19.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:01:51

No Duplicates.



**Comment 57 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Michael

Last Name: Egan

Email Address: Non-web submitted comment

Affiliation:

Subject: The City of Bellflower

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/871-20.pdf](http://www.arb.ca.gov/lists/scopingpln08/871-20.pdf)

Original File Name: 20.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:02:24

No Duplicates.

**Comment 58 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Terry

Last Name: McKittrick

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Dinuba

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/872-21.pdf](http://www.arb.ca.gov/lists/scopingpln08/872-21.pdf)

Original File Name: 21.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:03:11

No Duplicates.

**Comment 59 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Gregory

Last Name: Korduner

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Huntington Park

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/873-22.pdf](http://www.arb.ca.gov/lists/scopingpln08/873-22.pdf)

Original File Name: 22.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:04:04

No Duplicates.

**Comment 60 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Bob

Last Name: Zarrilli

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Commerce

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/874-20081126151704687.pdf](http://www.arb.ca.gov/lists/scopingpln08/874-20081126151704687.pdf)

Original File Name: 20081126151704687.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:06:03

No Duplicates.

**Comment 61 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Paul

Last Name: Little

Email Address: Non-web submitted comment

Affiliation:

Subject: Pasadena Chamber of Commerce

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/875-24.pdf](http://www.arb.ca.gov/lists/scopingpln08/875-24.pdf)

Original File Name: 24.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:08:16

No Duplicates.

**Comment 62 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Jeffrey

Last Name: Parker

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Claremont

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/876-25.pdf](http://www.arb.ca.gov/lists/scopingpln08/876-25.pdf)

Original File Name: 25.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:08:46

No Duplicates.

**Comment 63 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Jerry

Last Name: Amante

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Tustin

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/877-26.pdf](http://www.arb.ca.gov/lists/scopingpln08/877-26.pdf)

Original File Name: 26.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:09:31

No Duplicates.

**Comment 64 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Bill

Last Name: Dombroski

Email Address: Non-web submitted comment

Affiliation:

Subject: California Retailers Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/880-09.pdf](http://www.arb.ca.gov/lists/scopingpln08/880-09.pdf)

Original File Name: 09.pdf

Date and Time Comment Was Submitted: 2008-12-01 15:18:09

No Duplicates.



**Comment 65 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Greg

Last Name: Karras

Email Address: Non-web submitted comment

Affiliation:

Subject: Communication for a Better Environment (CBE)

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1731-comment.zip](http://www.arb.ca.gov/lists/scopingpln08/1731-comment.zip)

Original File Name: Comment.zip

Date and Time Comment Was Submitted: 2008-12-19 16:04:48

No Duplicates.

**Comment 66 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Rick

Last Name: Row

Email Address: Non-web submitted comment

Affiliation:

Subject: Sustainable Silicon Valley

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1732-01.pdf](http://www.arb.ca.gov/lists/scopingpln08/1732-01.pdf)

Original File Name: 01.pdf

Date and Time Comment Was Submitted: 2008-12-19 16:08:29

No Duplicates.

**Comment 67 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Amisha

Last Name: Patel

Email Address: Non-web submitted comment

Affiliation:

Subject: Cal Chamber

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1733-03.pdf](http://www.arb.ca.gov/lists/scopingpln08/1733-03.pdf)

Original File Name: 03.pdf

Date and Time Comment Was Submitted: 2008-12-19 16:16:27

No Duplicates.

**Comment 68 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Larry

Last Name: Forester

Email Address: Non-web submitted comment

Affiliation:

Subject: Councilmember- City of Signal Hill. Gateway Cities

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1734-04.pdf](http://www.arb.ca.gov/lists/scopingpln08/1734-04.pdf)

Original File Name: 04.pdf

Date and Time Comment Was Submitted: 2008-12-19 16:20:03

No Duplicates.

**Comment 69 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Peter

Last Name: Cooper

Email Address: Non-web submitted comment

Affiliation:

Subject: California Labor Foundation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1735-05.pdf](http://www.arb.ca.gov/lists/scopingpln08/1735-05.pdf)

Original File Name: 05.pdf

Date and Time Comment Was Submitted: 2008-12-19 16:20:53

No Duplicates.

**Comment 70 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Naomi

Last Name: Kim

Email Address: Non-web submitted comment

Affiliation:

Subject: California Environmental Rights Alliance

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1736-comments\\_2.zip](http://www.arb.ca.gov/lists/scopingpln08/1736-comments_2.zip)

Original File Name: Comments 2.zip

Date and Time Comment Was Submitted: 2008-12-19 16:22:43

No Duplicates.

**Comment 71 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Jesse

Last Name: Marquez

Email Address: Non-web submitted comment

Affiliation:

Subject: Coalition for a Safe Environment

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1737-comments\\_3.zip](http://www.arb.ca.gov/lists/scopingpln08/1737-comments_3.zip)

Original File Name: Comments 3.zip

Date and Time Comment Was Submitted: 2008-12-20 10:36:45

No Duplicates.

**Comment 72 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: NA

Last Name: Group Comments

Email Address: Non-web submitted comment

Affiliation:

Subject: AB 32 Scoping Plan Group Comments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1738-07.pdf](http://www.arb.ca.gov/lists/scopingpln08/1738-07.pdf)

Original File Name: 07.pdf

Date and Time Comment Was Submitted: 2008-12-20 10:37:56

No Duplicates.



**Comment 73 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Sarah

Last Name: Skikne

Email Address: Non-web submitted comment

Affiliation:

Subject: The Climate Group

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1739-08.pdf](http://www.arb.ca.gov/lists/scopingpln08/1739-08.pdf)

Original File Name: 08.pdf

Date and Time Comment Was Submitted: 2008-12-20 10:38:49

No Duplicates.

**Comment 74 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Timothy

Last Name: Flanigan

Email Address: Non-web submitted comment

Affiliation:

Subject: Flanigan Law Firm

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1740-09.pdf](http://www.arb.ca.gov/lists/scopingpln08/1740-09.pdf)

Original File Name: 09.pdf

Date and Time Comment Was Submitted: 2008-12-20 10:39:21

No Duplicates.

**Comment 75 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Melissa

Last Name: Kelly-Ortega

Email Address: Non-web submitted comment

Affiliation:

Subject: Public Member

Comment:

Attached copy of film "The 11th Hour".

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-20 10:42:27

No Duplicates.

**Comment 76 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Lisa

Last Name: Wilcox

Email Address: Non-web submitted comment

Affiliation:

Subject: Fillerton College

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1742-10.pdf](http://www.arb.ca.gov/lists/scopingpln08/1742-10.pdf)

Original File Name: 10.pdf

Date and Time Comment Was Submitted: 2008-12-20 10:43:53

No Duplicates.

**Comment 77 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Elaine

Last Name: Bell

Email Address: Non-web submitted comment

Affiliation:

Subject: American Lung Association- Post Card

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1762-american\\_lung\\_assoc0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/1762-american_lung_assoc0001.pdf)

Original File Name: american lung assoc0001.pdf

Date and Time Comment Was Submitted: 2009-01-14 14:06:20

141 Duplicates.

**Comment 78 for AB 32 Scoping Plan (scopingpln08). (At Hearing)**

First Name: Juan

Last Name: Montes de Oca

Email Address: Non-web submitted comment

Affiliation:

Subject: Clean Card Discount (Feebates)- Post Card

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/scopingpln08/1763-feedbates0001.pdf](http://www.arb.ca.gov/lists/scopingpln08/1763-feedbates0001.pdf)

Original File Name: feedbates0001.pdf

Date and Time Comment Was Submitted: 2009-01-14 14:07:38

200 Duplicates.