

## **Comment 1 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Muriel

Last Name: Strand

Email Address: auntym@earthlink.net

Affiliation:

Subject: tire pressure program

Comment:

Success in achieving widespread and essentially voluntary compliance with this effort from the average driver will be much better if it is easy for the average driver to make sure their tires are up to snuff.

It is very easy to measure tire pressure with simple gauges costing \$5-\$10. But locating an air supply at a refueling station that is free and in good working order is almost impossible.

So this particular Early Action (2-20) should be supported by requirements for easy and widespread access to compressed air supplies. Now I am certain that this represents a financial burden for many refueling stations. At low-cost stations where economically challenged drivers are most likely to be found. I believe profit margins are thin and come primarily from sales of junk food & gambling rather than from fuel sales. Moreover, air supply devices experience a lot of abuse and can be expensive to maintain. Any free good induces a certain level of moral hazard, such as drivers who need only air and no fuel at a particular time, as well as cyclists who only need air.

Therefore, refueling stations should have access to some financial support as necessary to provide this environmental service. For example, a very small state levy on fuel sales could fund this public good.

Now, such air supply devices are not terribly complicated nor often very precise. Refueling stations should not be required to maintain supply valves that are as accurate as the simple gauges mentioned above that are easy to learn to use for anyone who is smart enough to drive. Such precision supply valves are too easily compromised by the abuse they will inevitably experience, and maintenance should be focused on maintaining free air pressure and just such precision sufficient to avoid danger due to over-inflation.

As with many actions which will reduce GHG emissions, consumer education, acceptance, and commitment are essential to success. The onset of cool fall weather often induces under-inflation, so this is a time for drivers to be reminded to check. Some may have safety concerns about over-inflation. According to Click & Clack, under-inflation is usually more damaging to the tire, but what exactly are the factors of safety for over-inflation, especially after minor damage from under-inflation? Drivers need to hear and understand the actual facts.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-06 08:20:25

No Duplicates.

## **Comment 2 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Margaret  
Last Name: Felts  
Email Address: mcf@mcfelts.com  
Affiliation:

Subject: Emissions for natural gas systems  
Comment:

Regarding:  
SUMMARY # C14  
ID NUMBER: EJAC-3/ARB 2-12  
TITLE : REDUCE METHANE VENTING/LEAKS FROM OIL AND GAS  
SYSTEMS  
PROPONENT: ENVIRONMENTAL JUSTICE ADVISORY COMMITTEE AND  
CALIFORNIA AIR POLLUTION CONTROL OFFICERS ASSOCIATION

In the description, you are missing emissions from Natural Gas Storage Facilities in California. From work I've done in the past for the PUC, I know there can be -- and are -- significant losses of natural gas to the surface from underground storage facilities. The losses can be managed and held to a minimum by the way they operate the facilities. Proper management would reduce the amount of gas they can store. Although storage may be necessary to the industry to manage level gas supplies in the public system, the quantity stored could be less to accomplish the same goal. (The competing purpose of storing gas is to allow utilities to take advantage of wholesale gas price swings.) You would have to weigh the pricing advantage to the consumers against the value of reduced air emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-08 11:40:54

No Duplicates.

### **Comment 3 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Diana

Last Name: McKeen

Email Address: dmckeen@applevalley.org

Affiliation: Town of Apple Valley

Subject: Early Action Items to Reduce GHG

Comment:

It is imperative that the state take action to address diesel exhaust from the thousands of buses serving thousands of schools and running twice daily. To ignore the tons of GHG emitted by possibly the worst maintained (and probably oldest) fleet of diesel vehicles in California is unconscionable.

School buses, being located on residential streets as opposed to freeways, are more visible than semi-truck traffic and more omnipresent. The valuable measures that ARB takes to curb GHG will be more than offset by the continuing pollution observed from school buses. For the state to allow these obvious emissions from school buses to continue unchecked would make a mockery of AB 32's stated intention to reduce GHG.

The majority of jurisdictions, companies and private individuals will be ready to do what they can to reduce GHG, but they need to believe that California is serious and will set up reduction plans for the worst offenders -- such as school transportation districts.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-09 14:01:00

No Duplicates.

**Comment 4 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Chris

Last Name: Morfas

Email Address: cmorfas@airquality.org

Affiliation: Sacramento Metropolitan AQMD

Subject: Implement parking cash-out law

Comment:

The LAO has documented how VMT (and, thus, criteria and GHG emissions) can be reduced by implementing the state's existing parking cash-out law. Our district looks forward to working with you to implement this important land use and transportation measure with significant potential for helping the state achieve AB 32's goals. Thank you for your considerations.

Chris Morfas

SMAQMD

On behalf of Larry Greene and Tim Taylor, SMAQMD

Attachment: 'www.arb.ca.gov/lists/eamghg07/5-smaqmdparkingcashout.doc'

Original File Name: SMAQMDparkingcashout.doc

Date and Time Comment Was Submitted: 2007-10-12 09:57:31

No Duplicates.

**Comment 5 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07) - Non-Reg.**

First Name: James

Last Name: Brown

Email Address: dunmacht@natcem.com

Affiliation:

Subject: California Cement Manufacturers on AB 32 Key Implementation Issues

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/eamghg07/6-eamghg070001.pdf'

Original File Name: eamghg070001.pdf

Date and Time Comment Was Submitted: 2007-10-12 11:22:26

No Duplicates.

**Comment 6 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07) - Non-Reg.**

First Name: John  
Last Name: Ivancovich  
Email Address: jovan@garlic.com  
Affiliation:

Subject: Review of "Commuter Lanes" and Their Impact on Air Pollution  
Comment:

The commuter lanes on our freeways should be reviewed for their benefit or lack thereof, regarding air pollution.

One suggestion is to eliminate them, so that traffic can move easier in the other lanes, with less slow and/or stop-and-go periods, as more vehicles would be in the commuter lane, thus, freeing up the other lanes, to reduce slow and stop-and-go conditions.

Another, and possibly more important, suggestion is to allow trucks to use the commuter lanes at all times, to reduce the amount of time when they are stuck in slow traffic. When they are traveling slowly or at a stop-and-go pace, they create a lot more pollution than having them move along at steady, higher speeds.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-16 15:45:19

No Duplicates.

## **Comment 7 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Tom

Last Name: Kelly

Email Address: kyotousa@sbcglobal.net

Affiliation: KyotoUSA

Subject: Early Actions ARB 2-6 and SCAQMD - 3/ARB 2-9

Comment:

Many local governments are already implementing policies and programs that are aimed at reducing energy consumption and greenhouse gas emissions. ARB 2-6 (Guidance and Protocols for Local Governments) will be considered by the ARB in the 3rd quarter of 2008, far too late to make it relevant to the growing number of cities that are seeking guidance and support from the State right now.

The Institute for Local Government (ILG) is already addressing ARB 2-6 in its Best Practices Certification Program due for release before the end of 2007. The ARB would do well to partner with the ILG to bring these protocols forward and avoid a duplication of effort.

The recommendation for Cool Communities Program described in SCAQMD - 3/ARB 2-9 is that these programs be non-regulatory and voluntary. If these programs (Cool Roofs, Cool Pavements, and Urban Forests) have the potential to make significant reductions in greenhouse gas emissions, then they should be made mandatory and be accompanied by financial or other incentives that make it possible for cities to participate.

Seventy five percent of all greenhouse gas emissions are produced in our cities. Cities throughout the State are indicating their willingness to reduce their emissions, but are hampered in that effort by a lack of human and financial capacity to make a meaningful contribution. The State could help by putting additional resources into local governments that are ready to do their part.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-17 13:19:54

No Duplicates.



**Comment 8 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07) - Non-Reg.**

First Name: Jennifer

Last Name: Hiller

Email Address: Non-web submitted comment

Affiliation:

Subject: Citizen Letter- Take common-sense measures to reduce emissions that cause global warming.

Comment:

Please see attached

Attachment: 'www.arb.ca.gov/lists/eamghg07/11-eamghg07com0001.pdf'

Original File Name: eamghg07com0001.pdf

Date and Time Comment Was Submitted: 2007-10-18 16:00:13

500 Duplicates.

**Comment 9 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07) - Non-Reg.**

First Name: James  
Last Name: Nietter  
Email Address: flyashghg@hotmail.com  
Affiliation:

Subject: Remove "Fly Ash" from Blended Cement Measure B20  
Comment:

Dear CARB,

Thank you for your work on the important matter of reducing greenhouse gas emissions.

The use of fly ash - the toxic waste byproduct of coal fired power plants - dramatically increases greenhouse gas emissions when true lifecycle comparison is made to other cement production options. In addition, adding fly ash to clinker has proven to release back into the air all of the mercury that the coal fired power plants were supposed to be controlling.

I have attached more detailed information and references and appreciate your consideration of this important issue.

Attachment: 'www.arb.ca.gov/lists/eamghg07/12-carbflyash.doc'

Original File Name: CARBflyash.doc

Date and Time Comment Was Submitted: 2007-10-18 23:20:26

No Duplicates.

**Comment 10 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Dan

Last Name: deGrassi

Email Address: dpw180@co.santa-cruz.ca.us

Affiliation: County of Santa Cruz Public Works Dept

Subject: Collaborative Research to Understand How to Reduce GHG Emissions from Nitrogen Land Applic

Comment:

Dear ARB,

I would strongly recommend that any reserch into this subject should include examination of the effects of the application of compost to soils in the context of reducing nitrogen fertilizer requirements.

Information on this topic can be found at the National Sustainable Agriculture Information Service, the Soil Science Society of America, and the US Composting Council among many other sources.

Diverting organics from landfill disposal to composting not only reduces GHG emissions resulting from landfill generated methane gas, it also reduces GHG emissions by reducing the need for application of synthetic nitrogen fertilizers in agricultural and landscaping applications.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-19 09:45:23

No Duplicates.

**Comment 11 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Thomas

Last Name: Jacob

Email Address: tom.jacob@usa.dupont.com

Affiliation: DuPont Company

Subject: DuPont Comments on Final Early Action Recommendations

Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/eamghg07/14-dupont\_comment\_to\_arb\_--  
\_final\_early\_action\_report.doc'

Original File Name: DuPont Comment to ARB -- Final Early Action Report.doc

Date and Time Comment Was Submitted: 2007-10-22 15:12:44

No Duplicates.

## **Comment 12 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Toni

Last Name: Stein

Email Address: Tweil@igc.org

Affiliation: Resident/citizen of California

Subject: remove "fly ash additions to cement " from GHG mitigation measure #B20

Comment:

Dear CARB:

Please remove "fly ash additions" from mitigation measure #B20  
[ID NUMBER: EA B-1, B-2,TITLE: CEMENT (B): BLENDED CEMENTS] " in  
your expanded list of early action measures to reduce greenhouse  
gas (GHG) emissions,  
[http://www.arb.ca.gov/cc/ccea/meetings/091707workshop/ea\\_ii\\_report.pdf](http://www.arb.ca.gov/cc/ccea/meetings/091707workshop/ea_ii_report.pdf)

(see page 100 of the pdf /page B69 of the document).

Please remove the proposed strategy to reduce CO2 emissions by  
adding fly ash to replace clinker in the production of Portland  
Cement as an early action measure because fly ash cement mixtures  
may pose a potentially significant health and safety risk to  
communities, children, and workers exposed during its processing,  
or during its foreseeable uses in commercial buildings, schools or  
residences. See attached document for more detailed comments.

Attachment: 'www.arb.ca.gov/lists/eamghg07/15-  
remove\_fly\_ash\_additions\_in\_concrete\_early\_list\_of\_ghg\_reduction\_measures.doc'

Original File Name: Remove fly ash additions in concrete Early List of GHG reduction  
measures.doc

Date and Time Comment Was Submitted: 2007-10-22 23:38:37

No Duplicates.

**Comment 13 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: John

Last Name: Batt

Email Address: john.batt@airgas.com

Affiliation: Airgas, Inc.

Subject: Refrigerant Tracking, Reporting and Recovery Program - Supplemental Comment  
Comment:

Attached please find an additional comment by Airgas, Inc. on the October 2007 ARB Staff Final Report entitled "Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Action".

Attachment: 'www.arb.ca.gov/lists/eamghg07/16-  
comments\_to\_board\_on\_the\_early\_action\_final\_report\_-\_oct\_23\_2007.doc'

Original File Name: Comments to Board on the Early Action Final Report - Oct 23 2007.doc

Date and Time Comment Was Submitted: 2007-10-23 08:12:29

No Duplicates.

**Comment 14 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: George

Last Name: Gentry

Email Address: george.gentry@fire.ca.gov

Affiliation:

Subject: Early Action Comment

Comment:

See attached

Attachment: 'www.arb.ca.gov/lists/eamghg07/17-arb\_final.pdf'

Original File Name: arb final.pdf

Date and Time Comment Was Submitted: 2007-10-23 08:24:20

No Duplicates.

**Comment 15 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Amisha

Last Name: Patel

Email Address: amisha.patel@calchamber.com

Affiliation: CalChamber

Subject: Comments on Discrete Early Actions

Comment:

Attached are the California Chamber of Commerce's comments on the expanded list of early action measures recommended for Board consideration at the October 25th Air Board meeting. Thank you for your consideration.

Amisha Patel  
Policy Advocate  
CalChamber

Attachment: 'www.arb.ca.gov/lists/eamghg07/18-calchamber\_comments\_on\_early\_actions\_10.23.07.pdf'

Original File Name: CalChamber Comments on Early Actions 10.23.07.pdf

Date and Time Comment Was Submitted: 2007-10-23 11:10:54

No Duplicates.



## **Comment 16 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Rick

Last Name: Moore

Email Address: rick@edgarinc.org

Affiliation: California Refuse Removal Council

Subject: Comment: ARB 2-6 (Guidance & Protocols)

Comment:

Thank you for the opportunity to provide comments on the proposed expanded list of early action items to reduce greenhouse gases. The California Refuse Removal Council (CRRC) member companies provide comprehensive solid waste collection, transportation, processing, recycling, and disposal services. CRRC represents over 100 hauling companies and 50 recycling facilities statewide.

On behalf of the CRRC, I would like to express support for the proposed early action "Guidance and Protocols for Local Governments to Facilitate GHG Emission Reductions". Local governments are becoming increasingly interested in measuring and understanding their greenhouse gas impact and what measures can effectively reduce it. The development of protocols would greatly assist local governments who are already poised to take actions to reduce their greenhouse gas footprint and seek guidance as to how to best accomplish that goal.

Additionally, the CRRC supports the proposal by CARB staff to place a focused effort on voluntary actions, as described on Page 6 of the Notice of Public Meeting. Staff's suggestion to develop methodologies for the quantification of voluntary greenhouse gas emission reductions is very helpful.

Sincerely:

Rick Moore  
Senior Civil Engineer for Edgar & Associates  
on behalf of the California Refuse Removal Council

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-24 08:24:56

No Duplicates.

## **Comment 17 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Muriel  
Last Name: Strand  
Email Address: auntym@earthlink.net  
Affiliation:

Subject: public education & early action measures  
Comment:

please note that the text in this message box is reproduced in the attached file in a way that is formatted to highlight my comments as opposed to quotes from the staff report.

10/24/07  
To: ARB  
From: Muriel Strand  
Re: Comments on Discussion of Additions to the List of Early Action Measures to Reduce Greenhouse Gas Emissions Under AB 32 and Discussion of Concepts for Promoting and Recognizing Voluntary Early Actions

I urge approval of the staff proposal. I urge the Board to consider and support substantial public education measures related to the Early Actions and the New Early and Voluntary Actions.

As a graduate student in mechanical engineering and energy, about 20 years ago, I heard from professors such as John Holdren that the effectiveness of price signals and energy conservations measures had by that time substantially exceeded the initial expectations of the 1970s. I conclude that the elasticity of energy use and economic relationships is quite low in the short term, but fortunately quite high in the medium to long term.

Thus, I think staff are right on track when they say that "Voluntary and educational efforts are prominent examples of non-regulatory actions that can deliver real GHG emission reductions, and staff plans to pursue these efforts aggressively."

I believe that educational outreach can have particular impact in the following Early Actions:

5. Consumer products
6. Truck Efficiency
7. Tire Inflation Program
8. Reduce PFCs in semiconductor industry
9. Green Ports

ARB EARLY ACTIONS TO BE DEVELOPED BY 2012

New Early Actions recommendations to be considered by the Board:

1. Refrigerant Tracking, Reporting, and Recovery Program:
2. Cement (A): Energy Efficiency of California Cement Facilities:
3. Cement (B): Blended Cements:

4. Anti-idling Enforcement:
5. Collaborative Research to Understand How to Reduce GHG Emissions from Nitrogen Land Application:

The power of individuals in the public as a whole has a great deal of momentum. As staff notes, leaders in business and government already play an important role.

#### NEW FOCUSED EFFORT ON VOLUNTARY ACTIONS

A common theme during the verbal comment period of the September 17, 2007 public workshop was the need for ARB guidance for voluntary actions. Staff believes that the leadership shown by many businesses and local governments in reducing GHG emissions needs to be acknowledged and supported. A key first step to acknowledge such actions is to quantify and document voluntary emission reductions that rise beyond "business as usual". To that end, the ARB staff plans to propose at the October 25-26, 2007 Board hearing a framework for developing methodologies for the quantification of voluntary greenhouse gas emission reductions, and seek the Board's direction.

However I am not sure if staff or the Board appreciate the full potential of education of ordinary people that is implied in my graduate-school realization. And I think education of citizens and consumers is certainly one of the "traditional regulatory methods" that government staff have employed to implement legislative statute and intent. So I urge the Board to deeply support such outreach.

Those who object that some ideas or recommendations included in such education are "social engineering" should acknowledge that social engineering is inevitable. Existing conditions simply represent the result of social engineering as it operated in the past - including PR, public education, class-based competition, and other forms of economic leverage and brainwashing. More to the point is the list of criteria and methods for evaluating any social engineering proposal.

Moreover, if factual material is the centerpiece of public education measures, such objections may be minimized, as well as the creation of unproductive emotional reactivity and self-indulgent angst.

However, many people have difficulty discussing controversial issues, such as whose grass constitutes blight, with their neighbors or with those who disagree with their political opinions. If we are ever to function on a relocalized, sustainable basis, I think we will have to learn to talk about basic issues, to ask and answer the really key challenging questions about our ideas and opinions. The rigorous approach common in the physical sciences must be applied to the social and political sciences, yet given the nature of these sciences new criteria are required, such as prohibitions on self-indulgence, wishful thinking, double standards, self-righteousness, and using one's emotional upset to derail rational discussion.

I recommend to the Board the subject of "blight" as a case study, and the role of the lawn as a prototype. As you may know, lawns consume large and rather irrational quantities of water, high-nitrogen fertilizers, herbicides and pesticides, and are too often 'maintained' by squads of noisy gasoline machines such as lawnmowers and leafblowers. Why? Because lawns are thought to indicate prosperity and reduce "blight." But blight is extremely subjective and has been used to unjustly evict those without power from their residences. In my experience, public conversations about blight are fraught with violations of the criteria in the paragraph above. But if we cannot have a public discussion about an issue such as this where ecological sustainability is apparently so at odds with social sustainability, we are really sunk.

But how should the Board step into this new arena and potential minefield?

Judiciously and steadfastly.

One possible approach would be to explicitly broaden the mission of the Board's Environmental Justice Advisory Committee. Inspection of the Committee's Recommendations on the Early Action Measures suggests that the Committee may be overlooking substantial benefits of rearranging our lives to replace driving by walking and bicycling, to replace processed preserved food manufactured in faraway factories with fresh local homecooking, and to replace electronic toys with simple games and community activities. Such changes can be expected to reduce health care costs for both physical and emotional ailments, as well as increasing economic and social security.

It would be extremely beneficial if public education outreach included discussions of the shape, size, and organization of the sustainable society we will eventually reach, whether drastically or sensibly. As I watch the AB32 regulatory process unfold, I have become concerned that we are spending a lot of time and energy rearranging the deck chairs (of, say, commuting to work) on the Titanic of climate change that we could be spending on starting right away to return to traditional, sustainable, and simple lifeboat technologies. If we have a clear picture of where we want to end up, I think it far more likely that we will arrive there.

Attachment: 'www.arb.ca.gov/lists/eamghg07/21-arb\_comments-early\_measures.doc'

Original File Name: arb comments-early measures.doc

Date and Time Comment Was Submitted: 2007-10-24 09:36:29

No Duplicates.

**Comment 18 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: D. Douglas  
Last Name: Fratz  
Email Address: dfratz@cspa.org  
Affiliation: 202-872-8110

Subject: CSPA Comments on AB 32 Early Action Measures  
Comment:

Attached are CSPA's comments on the Additions to the List of Early Action Measures to Reduce Greenhouse Gas Emissions.

Attachment: 'www.arb.ca.gov/lists/eamghg07/22-cspa\_comments\_to\_arb\_on\_additional\_early\_action\_measures\_10-24-07.pdf'

Original File Name: CSPA Comments to ARB on Additional Early Action Measures 10-24-07.pdf

Date and Time Comment Was Submitted: 2007-10-24 10:24:11

No Duplicates.

**Comment 19 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: JOHN

Last Name: SUTTON

Email Address: Non-web submitted comment

Affiliation:

Subject: R134a automotive refrigerant as an AB 32 early action item

Comment:

Please see attached

Attachment: 'www.arb.ca.gov/lists/eamghg07/24-07102\_eamghg07.doc'

Original File Name: 07102 eamghg07.doc

Date and Time Comment Was Submitted: 2007-10-24 11:24:26

4 Duplicates.

**Comment 20 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Matt

Last Name: Vander Sluis

Email Address: mvander@pcl.org

Affiliation:

Subject: Comments Regarding Early Action Measures

Comment:

Please see our attached comments.

Attachment: 'www.arb.ca.gov/lists/eamghg07/25-pcl\_comments\_on\_expanded\_eams.pdf'

Original File Name: PCL Comments on Expanded EAMs.pdf

Date and Time Comment Was Submitted: 2007-10-24 11:38:37

No Duplicates.

**Comment 21 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Laura

Last Name: Genao

Email Address: laura.genao@sce.com

Affiliation: Southern California Edison Company

Subject: Comments Re Approval of Additions to the List of Early Actions

Comment:

Attached please find SCE's Comments on the Additions to the List of Early Actions.

Attachment: 'www.arb.ca.gov/lists/eamghg07/26-october\_24\_\_2007\_letter\_re\_early\_action\_additions.pdf'

Original File Name: October 24, 2007 letter re Early Action Additions.pdf

Date and Time Comment Was Submitted: 2007-10-24 11:39:06

No Duplicates.



## **Comment 22 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07) - Non-Reg.**

First Name: Dennis

Last Name: Burke

Email Address: dab@cyclus.com

Affiliation: Engineering Consultant

Subject: Early Action #8 and #31

Comment:

Gentleman:

I am deeply concerned about the proposed timing of agricultural early action # 8, "manure management" (methane digester protocol) and agricultural early action # 31, "collaborative research on greenhouse gas reductions from land application". The anaerobic digestion of manure should not be implemented without the control of ammonia and nitrogen emissions. The manure management protocol is scheduled to be completed by the third quarter of 2008 whereas the collaborative research on greenhouse gas emissions will not be completed until the fourth quarter of 2010.

As you must be aware the Central Valley of California suffers from significant ammonia emissions from the existing manure holding ponds. Although the existing manure holding ponds are very inefficient anaerobic reactors (partially covered anaerobic and anaerobic ponds) they still emit ammonia loads that are toxic. Implementation of more efficient anaerobic reactors will result in even larger discharges of ammonia. The ammonia will be discharged with the liquid effluent from the anaerobic reactor. Covering lagoons will not control the ammonia discharges. Ammonia discharges will only be enhanced by covering the ponds since ammonia will be emitted from the irrigation water.

The ammonia discharges are in and of themselves toxic. They lead to the formation of PM 2.5 that is also hazardous to human health.

Ammonia discharges will eventually be deposited on agricultural lands and undergo nitrification and denitrification leading to significant nitrous oxide emissions.

The bottom line is that in an effort to control methane emissions from open ponds, by covering those ponds and thereby creating more efficient anaerobic reactors, that we will increase the discharge of toxic gaseous pollutants as well as other powerful greenhouse gases. If you implement a methane control strategy from agricultural ponds you must also implement an ammonia nitrogen control strategy for the liquid and gaseous effluents from most ponds. Options to be considered include the use of aerobic treatment technologies, ammonia stripping and sequestering technologies, and or delays in implementing early action number 8 until early action number 31 has been completed.

Sincerely,

Dennis A. Burke PE (C 21404)

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-10-24 13:30:51

No Duplicates.

**Comment 1 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07). (At Hearing)**

First Name: Michael  
Last Name: Hertel  
Email Address: michael.hertel@sce.com  
Affiliation:

Subject: Southern California Edison  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/eamghg07/30-07102com0001.pdf](http://www.arb.ca.gov/lists/eamghg07/30-07102com0001.pdf)

Original File Name: 07102com0001.pdf

Date and Time Comment Was Submitted: 2007-10-29 13:45:50

No Duplicates.

**Comment 2 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07). (At Hearing)**

First Name: Frank

Last Name: Sheets

Email Address: Non-web submitted comment

Affiliation:

Subject: CCMEC

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/eamghg07/31-07102com0002.pdf](http://www.arb.ca.gov/lists/eamghg07/31-07102com0002.pdf)

Original File Name: 07102com0002.pdf

Date and Time Comment Was Submitted: 2007-10-29 14:22:11

No Duplicates.

**Comment 3 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07). (At Hearing)**

First Name: Robert

Last Name: Houston

Email Address: houstgrp@pacbell.net

Affiliation:

Subject: The Houston Group Additional Comments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/eamghg07/32-07102com1.pdf](http://www.arb.ca.gov/lists/eamghg07/32-07102com1.pdf)

Original File Name: 07102com1.pdf

Date and Time Comment Was Submitted: 2007-10-29 14:48:00

No Duplicates.

**Comment 4 for Early Action Measures to Reduce Greenhouse Gas Emissions (eamghg07). (At Hearing)**

First Name: Robert

Last Name: Houston

Email Address: houstgrp@pacbell.net

Affiliation:

Subject: Minimizing Leakage Under Climate Change Proposals Affecting California Cement Industry

Comment:

Please see attached Letter.

Executive Summary "Minimizing Leakage Under Climate Change Proposals Affecting the California Cement Industry) on behalf of Certain California Cement Manufacturers is not attached to comment but can be found in the Official Board Book for this the October Board Meeting.

Attachment: [www.arb.ca.gov/lists/eamghg07/33-07102com0003.pdf](http://www.arb.ca.gov/lists/eamghg07/33-07102com0003.pdf)

Original File Name: 07102com0003.pdf

Date and Time Comment Was Submitted: 2007-10-29 15:04:50

No Duplicates.

**Comment 5 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07). (At Hearing)**

First Name: Wendy

Last Name: James

Email Address: Non-web submitted comment

Affiliation:

Subject: Group Support for Expanding List of Early Action Measures

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/eamghg07/34-07102com0004.pdf](http://www.arb.ca.gov/lists/eamghg07/34-07102com0004.pdf)

Original File Name: 07102com0004.pdf

Date and Time Comment Was Submitted: 2007-10-29 15:09:23

No Duplicates.

**Comment 6 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07). (At Hearing)**

First Name: Muriel

Last Name: Stand

Email Address: Non-web submitted comment

Affiliation:

Subject: Sustainable Work for Youth

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/eamghg07/35-07102com0005.pdf](http://www.arb.ca.gov/lists/eamghg07/35-07102com0005.pdf)

Original File Name: 07102com0005.pdf

Date and Time Comment Was Submitted: 2007-10-29 15:18:09

No Duplicates.



**Comment 7 for Early Action Measures to Reduce Greenhouse Gas Emissions  
(eamghg07). (At Hearing)**

First Name: David

Last Name: Foster

Email Address: Non-web submitted comment

Affiliation:

Subject: On Behalf of the United Steelworkers on Early Action Items

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/eamghg07/36-07102com0001.pdf](http://www.arb.ca.gov/lists/eamghg07/36-07102com0001.pdf)

Original File Name: 07102com0001.pdf

Date and Time Comment Was Submitted: 2007-10-29 15:24:45

No Duplicates.