Comment 1 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Art
Last Name: Unger
Email Address: artunger@att.net
Affiliation:

Subject: How to spend auction proceeds
Comment:

```
Please spend auction proceeds to train and hire low skilled job
seekers to insulate homes. It will also take money to buy
materials. Make all roofs white with high albedo and put
photovoltaic panels on those not shaded.

It money is left, use it for buses.

In my house we save lots of money by dressing warmly indoors in
winter (hats, cotton gloves and sweaters or heavy bath robes) and
men not wearing a shirt on the hottest days. Would volunteer
celebrities and public officials get the word out so we could spend
all the money on insulation and roofs?
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-01-31 14:57:49

No Duplicates.

Comment 2 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Greg
Last Name: Watkins
Email Address: greg@carbconsultinc.com
Affiliation: CARBON CONSULTANTS, INC.

Subject: INVESTMENT PLAN FOR AUCTION PROCEEDS
Comment:

We believe the investment plan should include leveraging private developers investment into more projects. The number of APPROVED METHODOLOGY STANDARDS must be expanded from the restricted 7 and should match those in the Voluntary Carbon Standard and Compliance carbon worlds.

We are developing a 76,000 acre AFFORESTATION project using HDSR (high density short rotation)Megaflora trees that will provide a sustainably harvested fuel supply of 6,000,000 trees a year while maintaining a 10,000,000 tree / ton carbon sink per year. The trees will be turned into bio-diesel with a 70% reduced footprint over standard diesel, and renewable electricity, creating VCUs, and if I wheel some power to Mexico, CERs.

Investment proceeds should be used in the registration of these offset projects that creates the carbon credits that can be forward traded at a discount to provide equity for equipment and project financing. The State needs to leverage this market mechanism, participate in the carbon flow, creating a sustainable fund.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-01 11:28:14

No Duplicates.

Comment 3 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Art
Last Name: Unger
Email Address: artunger@att.net
Affiliation:

Subject: How to spend auction proceeds
Comment:

I am glad California will use the money from “Cap and Trade” to reduce GHG emissions. I am glad we will not allow a facility to decrease its total emissions at the expense of emitting air pollutants that impact disadvantaged communities.

The cheapest way to decrease GHG is to reduce fossil fuel use by conserving and efficiently using energy. Dress warmly in winter and wear as little as needed in summer so living space can be 78 degrees F. in summer, 61 degrees F. in winter. Insulate. Paint all roofs white.

Put photovoltaic panels on every unshaded roof, unshaded parking lot, canal and aqueduct, brownfield, former landfill or mining sites, superfund site, salted out or selenium-contaminated retired farmland.

Transportation: Improve bus service in disadvantaged communities and then elsewhere. Someday electric trains must replace cars, planes and diesel trains.

All organic waste must be returned to the soil or converted to energy. If it takes energy to collect the waste, like crop residue, it is probably best left in the field where it will emit GHG until it decomposes into fertilizer. It would be nice to turn the waste into the soil; but, that might require a fossil fueled tractor. If the waste is all in one place, as in a Concentrated Animal Feeding Operation (CAFO), biodigestion works. Of course we could save money, decrease the saturated fat in our food and reduce methane and carbon dioxide by restricting cows milk to baby cows and eating less pizza and ice cream. Feed delivered to CAFOs should be consumed before it emits too much GHG. Can the residue of biodigestion yield energy?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-09 10:00:33

No Duplicates.

Comment 4 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: James
Last Name: Miller
Email Address: jrusmiller@yahoo.com
Affiliation: Luz Engineering

Subject: Cap and Trade investment disbursements
Comment:

When I voted for the various rules to control green house gases, my expectation was that funds created by fees and taxes and carbon credit sales would be used to reduce greenhouse gases and not to displace funds in other programs for localized air pollution clean up or providing health services to people immediately affected by local air pollution such as asthma victims along diesel engine corridors both truck and rail.

While conversion of all port equipment to electricity will improve particulate concentrations in the port area, the focus of the cap and trade money must be on the most cost effective reduction of carbon emissions in the state.

As most of the air pollution in the LA Basin is caused by mobile equipment, cars and trucks, much attention will be paid to reducing vehicle miles and emissions. Cap and trade funds should be leveraged with public or private agencies seeking to convert motive power from combustion to electric power. If local air pollution funding or regulation conformance funding by private parties can offer to match cap and trade to yield higher reduction in carbon emissions than other projects, they should be preferentially funded.

Cap and trade should not be used for technology development. The state does not have sufficient technical personnel to choose winning technologies from among the hundreds being proposed to private investors. Investing in commercial projects with substantial technical risk seems acceptable when private parties have funded a project so that it can be financially successful without cap and trade monies.

For example, cap and trade monies should not be spent in designing better quality fuel cell stacks. The money should be spent replacing all public vehicles in the state with electric vehicles. This stops emissions and supports the private parties which have created the electric vehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-13 15:20:21

No Duplicates.

Comment 5 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Stephanie
Last Name: Ciancio
Email Address: stephanie.ciancio@presidiomba.org
Affiliation: Presidio Graduate School

Subject: Empowering community members to become decision makers
Comment:

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Based on the concern that community members who bear the burden of
environmental pollution have less access to the decision making
process, I think that an investment plan for the Cap-and-Trade
program should include scholarship grants for community members.
This could enable community members to become trained in better
business practices, clean technology and/or environmental law and
create engaged and empowered citizens to shape the future of their
communities.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-14 15:50:30

No Duplicates.

Comment 6 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Carol
Last Name: Misseldine
Email Address: cmisseldine@comcast.net
Affiliation: Green Cities California

Subject: Allocation of Cap & Trade revenue to local governments
Comment:

Local governments are instrumental to meeting state climate and energy goals. Many local governments, special districts and joint powers authorities have already taken action to reduce greenhouse gas (GHG) emissions through a variety of approaches, including clean and renewable energy projects, energy efficiency measures, facility and fleet upgrades and innovative planning processes.

The State should ensure that a portion of the Cap and Trade auction revenue be directed to local governments' GHG reduction efforts. Funds should be expended on proven GHG reducing projects as well as energy efficiency and clean energy generation projects that will create jobs, are ready to go, and can be exported to other local jurisdictions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-19 14:54:16

No Duplicates.

Comment 7 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Rodney
Last Name: Higgins
Email Address: ZEN12many@aol.com
Affiliation:

Subject: Reduce auto use in the CA valley
Comment:

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Attached is a plan, the "Greening of the Valley" which reduces
greenhouse gasses by reducing auto use.
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Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/12-greenvalley.doc

Original File Name: GreenValley.doc

Date and Time Comment Was Submitted: 2013-02-19 16:30:54

No Duplicates.

Comment 8 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jean
Last Name: King
Email Address: whjaking@comcast.net
Affiliation:

Subject: Urban forestry
Comment:

```
California has the top 5 most air-polluted areas in the country - )
Bakersfield and Delano, Calif.
2) Hanford and Corcoran, Calif.
3) Los Angeles, Long Beach, and Riverside, Calif.
4) Visalia and Porterville, Calif.
5) Fresno and Madera, Calif.

Urban trees can can help with this air pollution as will as provide
local parks, jobs and raise property values.

Thank you.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-19 18:30:59

No Duplicates.

Comment 9 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Bill
Last Name: Strand
Email Address: williamstrand@yahoo.com
Affiliation:

Subject: Spend proceeds of cap and trade on non-motorized transportation
Comment:

SB 375 calls for regional planning agencies and local governments to develop strategies for reducing greenhouse gas emissions by reducing per capita vehicle miles travled (VMT).

The proceeds from the cap and trade program should be spent on non-motorized improvements which facilitate Californians reducing VMT. California has the ideal climate for bicycling and walking and most of the state has very flat topography.

For decades Caltrans and regional planning agencies have spend nearly all of their funding on vehicular facilities. California can't continue like this any longer.

The proceeds from the cap and trade program must be spent according to SB 375 to reduce VMT and bicycle and pedestrian improvements are the most effective means to achieving this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-20 07:30:32

No Duplicates.

Comment 10 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: William
Last Name: Glassley
Email Address: wglassley@ucdavis.edu
Affiliation: California Geothermal Energy Collaborati

Subject: Investing Cap-and-Trade Funds - Geothermal Opportunities
Comment:

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Comments are in attached document.
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Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/15-carb_cgec_comments.docx

Original File Name: CARB_CGEC_Comments.docx

Date and Time Comment Was Submitted: 2013-02-20 13:02:46

No Duplicates.

Comment 11 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joshua
Last Name: Hugg
Email Address: jshugg@hlcsmc.org
Affiliation: Housing Leadership Council of San Mateo

Subject: Cap and Trade Auction Revenue Proposal
Comment:

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Please see attachment.

Thank you,
Josh
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Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/16-hlc_-_arb_cap_and_trade_-_comment_letter.pdf

Original File Name: HLC - ARB Cap and Trade - Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-02-20 14:31:35

No Duplicates.

Comment 12 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Hank
Last Name: Ryan
Email Address: hryan@smallbusinesscalifornia.org
Affiliation: Ex. Dir, Small Business California

Subject: Small Business Energy Efficiency Financing
Comment:

SB-Cal believes the value of small businesses investing in energy efficiency, including those businesses located in disadvantaged areas in California, fosters the aims and objectives of AB32.

To date, the potential for small business energy efficiency related investments through financing mechanisms is not being realized in California.

As we await currently pending CPUC decistions regarding energy efficiency financing opportunities utilizing "On Bill Repayment" methods, SB-Cal requests the opportunity to offer enhanced program designs in the coming months that we believe will offer the most cost effective use of AB32 proceeds.

We appreciate the opportunity to offer these limited comments.

Regards,

Hank Ryan, Exec. Dir., Small Business California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-21 00:26:33

No Duplicates.

Comment 13 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Danielle
Last Name: Christian
Email Address: danielle.christian@ceo.sccgov.org
Affiliation: County of Santa Clara

Subject: County of Santa Clara's comments on development of investment plan
Comment:

Counties and other local agencies are partners in the fight against global warming and are willing and able to lead in the development of innovative and effective programs to meet AB 32 objectives. Many local governments have experience with providing energy efficiency programs to our communities, utilizing existing ties with both residential and business interests. Most recently, two different Regional Energy Networks (RENs) have been formally recognized. These are geographically-significant coalitions of local governments that demonstrated exceptional design, management, cost-effectiveness, and performance during the State's ARRA-funded State Energy Program, and whose purpose is to accelerate the path to attainment of the State's emissions reductions and energy efficiency goals. Additionally, local government-managed energy programs are well suited to access public-private funding and partnerships, and create jobs by leveraging local and regional employment programs and relationships with organized labor and other groups. Many local agencies, including the County of Santa Clara, are already aggressively pursuing such projects, but the lack of financing represents a significant problem for cities and counties throughout the state.

For your additional consideration, our Board has adopted a set of principles to guide the spending of the cap-and-trade auction. These principles are attached.

We appreciate your consideration of our views.

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/19-cap_and_trade_principles.docx

Original File Name: cap and trade principles.docx

Date and Time Comment Was Submitted: 2013-02-21 11:09:11

No Duplicates.

Comment 14 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Chip
Last Name: Ashley
Email Address: wattsvalleypreservation@gmail.com
Affiliation: Tehipite Chapter of the Sierra Club

Subject: SB 535 Cap and Trade Auction Revenues
Comment:

Allocations of the Greenhouse Gas Reduction Fund should go to programs that provide assistance to improve energy efficiency, solar and other distributed renewable energy generation, improved public transit, and transit oriented development and housing designed to assist low-income communities which disproportionately suffer the impacts of greenhouse gases and related air and water pollution.

The CPUC's Energy Savings Assistance Program provides no-cost weatherization services to low-income households who meet the CARE income guidelines. Attic insulation, energy efficient refrigerators, energy efficient furnaces, weather-stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration are effective means of reducing energy use and thus GHG.

Investments in energy efficiency also reduce localized air pollution from power plants; reduce reliance on capital intensive and environmentally disruptive electric transmission lines; create jobs carried out by California workers, businesses, and community based organizations; generate beneficial economic multiplier effects to local economies; and increase energy and climate engagement.

Energy efficiency programs can be structured to promote or provide job creation, workforce development and green jobs training opportunities. EE improves indoor air quality, making low-income homes more comfortable and safe for sensitive populations such as children and the elderly. Finally, EE can provide enduring long-term bill relief to disadvantaged communities, which spend a disproportionate percentage of their income on basic services like electricity, natural gas, and water. EE also provides opportunities to engage low-income communities on the relation between their consumption and climate change, as well as steps they can take to address it.
Providing Disadvantaged communities with low cost solar generation and passive solar space heating and water heating would be a good use of cap and trade revenues. The California Solar Initiative (CSI) Single-family Affordable Solar Homes (SASH) Program and Multi-family Affordable Solar Housing (MASH) Program offer solar incentives to energy customers. SASH and MASH should be scaled up with the goal of reaching more low-income household across California.

Distributed solar energy provides a zero-carbon alternative

generation resource. Home solar energy systems reduce a households carbon footprint, cut greenhouse gas emissions, and help fight global warming. Home solar systems reduce localized air pollution from power plants; reduce reliance on capital intensive and environmentally disruptive electric transmission lines; create jobs carried out by California workers, businesses, and community based organizations; generate beneficial economic multiplier effects to local economies; and increases energy and climate engagement for disadvantaged communities.

Some of the money should go to transit in disadvantaged communities. The State Transit Assistance (STA) program provides funding to local public transit agencies and regional transportation planning agencies (RTPAs) to fund a portion of the operations and capital costs associated with local mass transportation programs. Funds should be allocated to operate increased levels of public transit service statewide, but particularly in the Central Valley because of the concentration of disadvantaged communities there. Funds would target routes with strong GHG emissions reduction potential and pay for operating costs associated with increased service levels. Capital uses would be limited to maintenance and the purchase of new transit vehicles necessary to operate additional service.

Reducing driving through increased use of public transit is a necessary component of an effective strategy to meet AB 32 goals. California’s transportation sector is responsible for the most GHG emissions of any sector, and private vehicle use is the largest contributor to a household’s carbon footprint.

Public transit provides Californians with a low-carbon alternative to driving. Studies show that public transit reduces automobile use, produces significantly lower GHG emissions compared to single-occupant vehicle use, and facilitates higher density development and travel patterns with lower carbon impacts.

Using public transit is one of the most significant steps individuals can take to reduce household GHG emissions. By taking public transit to work instead of driving, an individual with a 20-mile round trip commute will reduce his or her CO2 emissions by approximately 4,800 pounds per year. This represents a 10% reduction of all GHG emissions for a typical two-adult two-car household. If a two-car household eliminated one car and used public transit instead, it could potentially see a 30% reduction in its GHG emissions.

While transit ridership has reached record levels in recent years and demand continues to rise, transit systems have struggled to maintain existing service levels due to insufficient funds to pay for operating expenses. The recession’s impact on local revenues combined with diversions of transit operating funds by the State between 2000 and 2009, forced nearly every transit agency to implement deep service cuts and fare increases. Operating funds are desperately needed as California already has an estimated $22 billion transit operating shortfall through 2020.

Public transit reduces localized air pollution, creates jobs carried out by California workers (e.g., bus and train operators, mechanics) and businesses, generates beneficial economic multiplier effects to local economies, and increases mobility for disadvantaged communities.

Transit riders are disproportionately low-income and live in households that have lower automobile ownership rates than the rest of the population. Public transit also serves high concentrations of people of color, the elderly, persons with disabilities, immigrants and youth. Increasing transit service can be a powerful anti-poverty strategy as very-lowincome households can spend up to 55% of their budget on transportation. Households that use public transit save an average of $6,251 per year.

To count towards the SB 535 25% minimum for funds spent to benefit residents of disadvantaged communities, STA funds should provide increased service on transit routes that carry high proportions of disadvantaged residents. To count toward the 10% minimum for funds that are spent within disadvantaged communities, STA funds should provide increased service on routes that run through disadvantaged communities. Eligible uses of the SB 535 portion of the GGRF allocation would include transit operating expenses and fare subsidies that incentivize greater transit utilization by disadvantaged residents, and capital uses necessary to increase service levels.

Disadvantaged communities often lack access to public transit or suffer from inadequate service levels and high fares. For many of their residents, public transit is the primary way to access employment, education, health care, grocery stores and other vital necessities. Cuts to public transit services throughout California over the past decade have fallen hardest on low-income residents, people of color, seniors, and persons with disabilities. In Los Angeles alone, nearly 1 million hours of bus service were eliminated between 2007 and 2011, affecting a ridership population that is overwhelmingly low-income and 90 percent African American, Latino, and Asian Pacific Islander. The average income of an LA Metro bus rider is just under $14,000.

Residents of disadvantaged communities in the Central Valley--as indicated in the maps displayed at the workshop in Fresno on February 19, 2013--suffer greatly because of the lack of adequate public transit. The long travel distances from small rural towns to jobs and services in large cities adds greatly to greenhouse gas generation. Adequate public transit with more daily round trips per day from small towns like Mendota and Huron to Fresno would greatly reduce GHG produced when economically disadvantaged people drive their old gas guzzlers long distances to jobs, shopping, and services. More public transit would have the co-benefit of reducing transportation costs to these low-income rural residents. Presently, Central Valley Counties do not have the necessary funding to provide this transit, so the GGRF could be well spent on public transit in these areas.

Few burdens are associated with increasing transit service. Nominal increases in traffic and emissions resulting from additional transit vehicles in service are offset by overall reductions in traffic and emissions from reduced automobile use. In contrast, transit capital expansion projects can involve construction and activities that displace or otherwise negatively impact surrounding neighborhood residents and local businesses.

The state’s Transit-Oriented Development (TOD) Housing Program promotes the development of homes in close proximity to transit access. The program provides low-interest loans as gap financing for rental developments that include homes affordable to

lower-income households, and as mortgage assistance for homeownership developments. In addition, grants are available to cities, counties, and transit agencies for infrastructure improvements necessary for the development of specified housing developments, or to facilitate connections between these developments and the transit station.

CA Department of Housing and Community Development provides transit-oriented housing affordable to very low income households, who depend on and use transit at significantly higher rates than the general population. SB 375 aims to reduce GHGs by coordinating regional planning of transportation and land use so as to reduce driving and increase transit use. TOD can be an important strategy for meeting these goals. Proximity to transit is a major contributor to transit use and can significantly reduce VMT.

By bringing housing closer to transit stops, TOD reduces VMT and GHG emissions, especially when both jobs and housing are within easy reach of transit. A 1993 study of California TODs showed that of residents who had previously "lived away from transit, 52.3 percent switched to transit commuting upon moving within ½ mile walking distance of a rail station."

TOD, however, is not by itself enough to reach the policy goals of reducing VMT and GHG emissions. In fact, it can backfire by displacing lower income families from transit-rich urban neighborhoods. (TOD rents are typically 10-20% higher than in comparable residential neighborhoods.) Residents with household incomes under about $20,000 – those in the very low income category – have far lower rates of auto ownership and higher rates of transit ridership than the general population. A quarter of these households own no car at all (compared to 8.3% overall), and another half own only one car.

More dependent on transit, very low income residents take more than four times as many transit trips as members of the population at large. When TOD displaces these families, it not only reduces ridership by making transit inaccessible to the most frequent transit riders, it also increases the likelihood that a very low income household will purchase a high-polluting but cheap used car. For TOD to succeed as a GHG-reduction strategy, it must include housing affordable to very low income families.

Providing housing near transit affordable to very low income families has health, mobility and economic co-benefits. Health co-benefits include reduced auto emissions, including co-pollutants; increased active transportation (walking, biking), associated with lower rates of obesity and chronic diseases like diabetes; and health benefits associated with stable, safe and affordable housing. Mobility co-benefits include greater accessibility to transit; increased transit ridership, which improves the economic viability of transit agencies and allows them to increase service; and reduced vehicle traffic. Economic co-benefits include greater job accessibility for low-income families, the creation of permanent jobs carried out by California workers (e.g., property managers, grounds maintenance staff, bus and train operators, mechanics) and businesses; the generation of economic multiplier effects to local economies; and the leveraging of federal funding streams. Construction of TOD projects leverages private and federal investment and provides new job opportunities.

Finally, affordable TOD housing is an effective anti-poverty

program, significantly reducing the combined housing and transportation (H+T) cost burden on low-income families. Benefit to Disadvantaged Communities: Affordable TOD housing allows disadvantaged residents to live near transit and jobs, reduces household H+T cost burden, and stabilizes and protects against the risk of displacement low-income residents who are core transit riders. This increased residential stability has major health benefits for low income families, such as reducing stress and increasing available resources for nutritious food and health care costs. Proximity to transit increases access to amenities, education, healthcare, grocery stores and other vital destinations, especially for people of color, the elderly, people with disabilities, and youth. When affordable TOD is located in healthy, high-opportunity places, lower income families benefit from improved health, education and economic outcomes.

Eligible uses of Greenhouse Gas Reduction Fund (GGRF) allocations under SB 535 would include low-interest loans for affordable homeownership and rental development affordable to very low-income residents. To count towards the 25% minimum for funds spent to benefit disadvantaged residents, GGRF allocations for the TOD program should fund the development of housing affordable to very low income residents near transit nodes, both in disadvantaged communities and in other communities. To count toward the 10% minimum for funds that are spent within disadvantaged communities, GGRF allocations should fund the development of housing affordable to very low income residents near transit nodes in disadvantaged communities.

Housing and transportation planning agencies would be required to hold accessible workshops to solicit and consider input from residents of disadvantaged communities for a proposed TOD project. The workshops would occur early enough in the planning process to influence staff recommendations on how to invest GGRF allocations. Local public workshops would identify high priority residential and commercial development needs of disadvantaged communities for the TOD project. To address high poverty and unemployment in disadvantaged communities, they should be hired for jobs associated with constructing the TOD project. Without affordable housing, TOD can impose displacement and other burdens on low-income residents, including the loss of the small business that serve them. Funds earmarked for the TOD Housing Program will protect against those burdens by producing homes affordable to very low income households. This will help stabilize gentrifying neighborhoods, promoting mixed-income communities that include disadvantaged residents and high propensity public transit users.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-21 10:39:06

No Duplicates.

Comment 15 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Frank T.
Last Name: Lossy
Email Address: ftlossy322@comcast.net
Affiliation: physician in private practice

Subject: Cap-and Trade program
Comment:

Thank you for accepting these comments on the Cap-and-Trade Auction Proceeds Investment Plan Concept Paper. The best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend. The Economic and Allocations Advisory Committee (EAAC) recommended that "the largest share (roughly 75%) of allowance value should be returned to California households… through lump-sum payments…" and "roughly 25% of this value used to finance socially beneficial investments and other public expenditures." Dividends accomplish the AB32 goals relating to equity, and maximizing additional environmental, economic, and overall societal benefits.

Although rebates are already being proposed for the electricity sector, those rebates will not compensate consumers for costs from transportation fuels and indirect costs from other goods and services that are passed through as energy costs rise. When the transportation sector enters the program in 2015, consumers will see a very visible hit to their pocketbooks. The best way to defuse a potential political backlash is to include a dividend for transportation sector and indirect costs in the Investment Plan.

Some investments are expensive and may not result in reduced emissions until after 2020. That said, if the State follows the 75% dividends and 25% investments model recommended by the EAAC, some positive investment projects would include local government activities that reduce GHGs, financing programs that leverage private capital for energy efficiency (i.e. PACE financing for building energy efficiency and on-bill financing), activities that reduce the carbon content of water treatment and delivery, projects in disadvantaged communities (i.e. school bus retrofits), market transformation and R&D programs (i.e. distributed generation, micro-grids, web-enabled transportation information and networking systems), and biochar carbon sequestration in the agricultural sector.

Most importantly, please include dividends in the Auction Proceeds Investment Plan.

Sincerely,

Frank T. Lossy, M.D. and Barbara Steinberg, LCSW

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-21 21:59:39

No Duplicates.

Comment 16 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mike
Last Name: Sandler
Email Address: mike@carbonshare.org
Affiliation: CarbonShare.org

Subject: Dividends for Transportation and Indirect Costs
Comment:

```
Regarding the investment of Cap-and-Trade auction proceeds, the
best use of revenues is returning them to the public through a
dividend.  Although rebates are already being contemplated for the
electricity sector, consumers will be facing additional costs in
the industrial and transportation sectors as well as indirect costs
from other goods and services that are passed through as energy
costs rise. Transportation fuels will enter the program in 2015,
causing a very visible hit to consumers' pocketbooks.  The best way
to defuse the resulting potential political backlash is to include
a dividend for transportation sector and indirect costs in the
Investment Plan.

Please see the attachment for additional comments.
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Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/22-commenttoarb2-22-13sandler.pdf

Original File Name: CommenttoARB2-22-13Sandler.pdf

Date and Time Comment Was Submitted: 2013-02-22 07:20:27

No Duplicates.

Comment 17 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: James E
Last Name: Vann
Email Address: james.vann@gmail.com
Affiliation: Oakland Tenants Union

Subject: Cap and Trade Auction Revenue Proposal
Comment:

Cap & Trade revenue should be devoted to Building and Preserving Affordable Homes Near Transit: Affordable TOD as a Greenhouse Gas Reduction and Equity Strategy." Allocating cap and trade revenue funding for transit-oriented development is a proven greenhouse gas (GHG) reduction strategy. According to CHPC, there is strong evidence that building and preserving affordable homes near transit will allow California to achieve substantial reductions in greenhouse gas emissions. The report also highlights that investing only in transit would cause displacement of low-income households.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-22 08:52:46

No Duplicates.

Comment 18 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Chip
Last Name: Ashley
Email Address: wattsvalleypreservation@gmail.com
Affiliation:

Subject: Biomass Pyrolysis Provides Carbon-Negative Energy
Comment:

Some of the auction proceeds should go to developing small scale biomass pyrolysis plants (up to 3 megawatts generation capacity)and biodigesters wherever green waste streams are available.

Biodigestion creates renewable natural gas and adds no net carbon to the atmosphere. Biomass pyrolysis creates renewable natural gas and other useful byproducts and is carbon-negative. Pyrolysis is carbon-negative because it produces biochar (a form of charcoal) that is an excellent soil amendment for carbon depleted soils. Biochar is at least 80% pure carbon and is resistant to oxidation. Thus, when added to soil it is a form of carbon sequestration.

Carbon neutral and carbon-negative technologies offer a means of replacing carbon-positive fuels like coal and fossil natural gas. Thus they have obvious benefits in designing an economy that has a goal of reducing greenhouse gases.

These technologies would provide co-benefits to low-income communities in agricultural areas and communities tied to forestry economies that have been impacted by reduction in timber harvest in recent years.

Agricultural economies, like that in the Central Valley, would benefit by producing carbon-neutral or -negative fuel that can be used in both transportation and electrical generation. Agricultural residues can provide vast quantities of fuel stock for these plants. Small scale plants would add new jobs and diversification to the Central Valley economy.

California's forest contain a huge glut of small-diameter timber that currently impacts these forests' resiliency against wildfire. Wildfire adds large amounts of GHG to the atmosphere. Instead of being potential kindling for the next stand-replacing wildfire, these small trees can be removed and used as fuel to make carbon-negative fuel for transportation and electrical generation.

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/25-biomass_pyrolysis_and_biodigestion.zip

Original File Name: Biomass Pyrolysis and Biodigestion.zip

Date and Time Comment Was Submitted: 2013-02-22 08:22:06

No Duplicates.

Comment 19 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Howard
Last Name: Choy
Email Address: hchoy@isd.lacounty.gov
Affiliation: Los Angeles County

Subject: Support for Local Government GHG Reduction Programs
Comment:

As General anager of the Los Angeles County Office of Sustainability, Chair of the Local Government Sustainable Energy Coalition, Founding Member of the Los Angeles Regional Collaboative for Climate Action and Sustainability, and Director of the recently, CPUC-approved Southern California Regional Energy Network,I am pleased to submit the following papers which propose the use of Cap&Trade Program Revenues to support local government programs which can create effective, efficient and region-wide GHG mitigation impacts throughout the State.

Local governments and public agencies, through regional collaboration, are well positioned to help the State meet its GHG reduction targets.

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/26-los_angeles_county.zip

Original File Name: Los Angeles County.zip

Date and Time Comment Was Submitted: 2013-02-22 09:34:27

No Duplicates.

Comment 20 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Stacey
Last Name: Meinzen
Email Address: staceymeinzen@gmail.com
Affiliation:

Subject: AB32 Cap and Tade Investment Plan
Comment:

Thank you for accepting these comments on the Cap-and-Trade Auction Proceeds Investment Plan Concept Paper. The best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend. The Economic and Allocations Advisory Committee (EAAC) recommended that â€œthe largest share (roughly 75%) of allowance value should be returned to California householdsâ€¦ through lump-sum paymentsâ€¦â€• and â€œroughly 25% of this value used to finance socially beneficial investments and other public expenditures.â€• Dividends accomplish the AB32 goals relating to equity, and maximizing additional environmental, economic, and overall societal benefits.

Although rebates are already being proposed for the electricity sector, those rebates will not compensate consumers for costs from transportation fuels and indirect costs from other goods and services that are passed through as energy costs rise. When the transportation sector enters the program in 2015, consumers will see a very visible hit to their pocketbooks. The best way to defuse a potential political backlash is to include a dividend for transportation sector and indirect costs in the Investment Plan.

Some investments are expensive and may not result in reduced emissions until after 2020. That said, if the State follows the 75% dividends and 25% investments model recommended by the EAAC, some positive investment projects would include local government activities that reduce GHGs, financing programs that leverage private capital for energy efficiency (i.e. PACE financing for building energy efficiency and on-bill financing), activities that reduce the carbon content of water treatment and delivery, projects in disadvantaged communities (i.e. school bus retrofits), market transformation and R&D programs (i.e. distributed generation, micro-grids, web-enabled transportation information and networking systems), and biochar carbon sequestration in the agricultural sector.

Most importantly, please include dividends in the Auction Proceeds Investment Plan.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-22 11:13:50

No Duplicates.

Comment 21 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Paul
Last Name: Matsuoka
Email Address: pmatsuoka@lavta.org
Affiliation: Livermore Amador Valley Transit Authorit

Subject: Support for Transportation Coalition for Livable Communities proposal
Comment:

```
I support the proposal submitted by the Transportation Coalition
for Livable Communities with respect to the Investment Plan for
CARB's Cap and Trade program.  Transportation investments,
especially transit service, but also road and bridge maintenance,
complete streets and urban greening, and clean technology
infrastructure, integrated with land use changes, will achieve the
maximum greenhouse gas emission reductions.  They would also be
supportive and consistent with the policy direction of SB375 and
AB32.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-22 15:08:21

No Duplicates.

Comment 22 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Erin
Last Name: Axelrod
Email Address: erin@dailyacts.org
Affiliation:

Subject: Comments on the cap and trade auction proceeds investment plan concept paper.
Comment:

Thank you for accepting these comments on the Cap-and-Trade Auction Proceeds Investment Plan Concept Paper. The best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend. The Economic and Allocations Advisory Committee (EAAC) recommended that "the largest share (roughly 75%) of allowance value should be returned to California households… through lump-sum payments…" and "roughly 25% of this value used to finance socially beneficial investments and other public expenditures." Dividends accomplish the AB32 goals relating to equity, and maximizing additional environmental, economic, and overall societal benefits.

Although rebates are already being proposed for the electricity sector, those rebates will not compensate consumers for costs from transportation fuels and indirect costs from other goods and services that are passed through as energy costs rise. When the transportation sector enters the program in 2015, consumers will see a very visible hit to their pocketbooks. The best way to defuse a potential political backlash is to include a dividend for transportation sector and indirect costs in the Investment Plan.

Some investments are expensive and may not result in reduced emissions until after 2020. That said, if the State follows the 75% dividends and 25% investments model recommended by the EAAC, some positive investment projects would include local government activities that reduce GHGs, financing programs that leverage private capital for energy efficiency (i.e. PACE financing for building energy efficiency and on-bill financing), activities that reduce the carbon content of water treatment and delivery, projects in disadvantaged communities (i.e. school bus retrofits), market transformation and R&D programs (i.e. distributed generation, micro-grids, web-enabled transportation information and networking systems), and biochar carbon sequestration in the agricultural sector.

Most importantly, please include dividends in the Auction Proceeds Investment Plan.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-22 17:11:46

2 Duplicates.

Comment 23 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jon
Last Name: Winter
Email Address: wint@tdl.com
Affiliation:

Subject: Cap and Trade
Comment:

```
I like the idea of cap-and-trade reductions offered by AB 32.  If
something is not done and soon about air quality, we all will
suffer even those who argue the process from only an economic POV.
I often feel we are just "re-arranging the chairs on the deck of
the Titanic" when objections are raised.  We need to do this now or
we need look no further than Beijing to see what the future holds
for us.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-23 12:12:36

No Duplicates.

Comment 24 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: David
Last Name: Cook
Email Address: dave@energyconversions.com
Affiliation: Energy Conversions Inc

Subject: Near Zero CNG/Hybrid Commuter Locomotives
Comment:

Attached is a white paper on a CNG/Hybrid locomotive solution. This is a practical near term solution for commuter rail, it is 1/6 the cost of rail electrification to implement and leads to near zero emissions in the short term. With Metrolink as a case study, the organization is missing an opportunity to save $1.5 million dollars a month in fuel savings until this technology is implemented. Because this system is a rebuild/upgrade, locomotive manufacturers will lean more towards a new locomotive approach. With the municipal agencies getting the fuel savings, the commutinity getting the faster trains and lower emissions sooner, and SB170 allowing state agencies to get the development grant funding returned from system sales to other customers; it makes a lot of sense to use cap and trade funds to invest in a public private partnership with local small and flexible companies to get this moving sooner than later.

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/34-cng_hybrid_commuter_locomotive_concept.pdf

Original File Name: CNG Hybrid Commuter Locomotive Concept.pdf

Date and Time Comment Was Submitted: 2013-02-25 10:46:32

No Duplicates.

Comment 25 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jim
Last Name: Sweeney
Email Address: jim_sweeney@hotmail.com
Affiliation:

Subject: Cap and Trade proceeds to fund better bicycle infrastructure
Comment:

```
That 60% of trips in California are taken by car is a shameful
statistic.  Many of these trips are undertaken by car due to the,
at least perceived, danger of riding a bicycle along side cars.  I
would hope that a portion of the proceeds from any cap-and-trade
program would go toward ways to increase bicycle trips, such as
bike lanes, paths, safety programs, mandatory vehicular homicide
sentences for motorists leaving the scene of a bike fatality, etc.

Thank you,
Jim Sweeney
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-25 13:56:07

No Duplicates.

Comment 26 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Charles
Last Name: Holden
Email Address: rusthold@mindspring.com
Affiliation: Charles S. Holden Attorney

Subject: Proposal for Investment
Comment:

```
Dear Californians:

I provide a short concept paper that sets out an approach that will
reduce carbon dioxide emissions here and elsewhere. I propose that
natural gas be processed to remove some of the carbon it contains.
The suggestion is that a new industrial fuel, methane enriched with
hydrogen, will introduce less carbon dioxide to the atmosphere than
unprocessed natural gas. The improved fuel could be used for
cleaner electric power generation and for many other applications.

Respectfully submitted,

Charles S. Holden
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/37-air_resources_board_investment_solicitation_2_25_13_.pdf

Original File Name: Air Resources Board Investment Solicitation 2 25 13 .pdf

Date and Time Comment Was Submitted: 2013-02-25 16:38:22

No Duplicates.

Comment 27 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Evan
Last Name: Edgar
Email Address: evan@edgarinc.org
Affiliation: CA Compost Coalition

Subject: 3-Year Investment Proposal for Anerobic Digestion and Compost
Comment:

CCC hereby presents this White Paper (copy attached) to provide proposed details for the Investment of Cap and Trade Auction Proceeds Investment Plan for Fiscal Years 2013-2014, 2014-2015, and 2015-2016. This planning process facilitated by the Department of Finance with the California Air Resources Board is to include the examination of sustainable agriculture practices (including the development of bioenergy), and the diversion of organic waste to bioenergy and composting. CCC presents the following investment programs to be examined for funding.

At the nexus of AB 32: Anaerobic digestion and composting are at the nexus of the AB 32 Scoping Plan adopted measures (as noted in Table 1 below) where commercial organic wastes are diverted from landfilling to generate renewable energy and negative carbon fuel, resulting in quality compost that is returned to sustainable agriculture.

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/38-ccc_cap-and-trade_white_paperversionfeb25version1.1.pdf

Original File Name: CCC Cap-and-Trade White PaperVersionFeb25Version1.1.pdf

Date and Time Comment Was Submitted: 2013-02-25 20:51:49

No Duplicates.

Comment 28 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tim
Last Name: Goncharoff
Email Address: dpw131@co.santa-cruz.ca.us
Affiliation: County of Santa Cruz

Subject: Support for local governments
Comment:

```
Funding for local governments's efforts on climate change must be a
large and ongoing component of the state's funding program.

Specific areas which need funding include:

Community Choice Aggregation (CCA) programs to encourage
distributed alternative energy generation in the residential
sector.

Methane capture systems for landfills, the single largest source of
greenhouse gases for most local governments.

Low-emission and zero-emission vehicles.

Solar energy installations for local government facilities.

Conversion of streetlights to LEDs.

Green Business Programs.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-26 07:51:58

No Duplicates.

Comment 29 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: ROBERT
Last Name: DEFERRANTE
Email Address: rdeferrante@gmail.com
Affiliation:

Subject: Increase Bicycle Infrastructure Funding in California
Comment:

```
At present there are very limited state and federal dollars for
active transportation projects, which local communities depend on
to improve their bike- and walk-ability. This new program is a
unique opportunity to increase the amount of funding available to
make CA cities more bike-friendly.

I strongly urge CARB to set aside funds for bike and pedestrian
projects.

Thank you,
Robert deFerrante
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-26 09:39:55

No Duplicates.

Comment 30 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Christopher
Last Name: Wiggins
Email Address: chris@glidecruisers.com
Affiliation: SARTA

Subject: Clean Tech Personal Transportation
Comment:

Hello - I attended the CalEPA Cap & Trade workshop yesterday in Sacramento. Interesting discussion! I was hoping to be a speaker but the list was full. Anyhow, I have a small Sacramento area start-up that designs and manufactures a line of zero emissions electric-drive stand-up cycles for personal use (errands and short commutes)and police / patrol applications.

We have over 3 years of R&D, engineering and pre-market testing completed on the project. We also have done a couple small production runs for our first edition and have sold 40 units into the market including a couple Patrol units to San Mateo College / campus security detail (see attached images). We have been getting allot of interest from various police departments and public security venues (for when they have funds). But, we are lacking the funds to do another production run and scale the company to wider distribution.

Our Police / Patrol units are an excellent solution for short-range patrols, special events, down-town congested areas, college campus patrols, government facility patrols, etc. And they are silent with zero emissions! We have a local facility / shop where they are made (Made in USA) and we are in a position to create lots of jobs once we gain a little critical mass in the market place..

I personally see the potential for creating "clean community" zones where we can directly impact reduction in vehicle emissions by deploying our products (and/or other ones like them) in select communities where they would be an efficient mode of transportation. Cities and towns where there are bike trails as a general rule since our product is legal on most bike trails and bike lanes.

Anyway, I have attached some additional information about my company and products. I am determined one way or another to grow my company and make an impact in society - but certainly having the support of agencies like yours could go a long way to help. We are in fund raising mode in order to get to the next success level~!

Thanks for your consideration!

Chris Wiggins
Glide Cruisers, USA

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/41-glide_cruisers__usa.zip

Original File Name: Glide Cruisers, USA.zip

Date and Time Comment Was Submitted: 2013-02-26 10:38:56

No Duplicates.

Comment 31 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Monika
Last Name: Weiss
Email Address: mweiss@ergsol.com
Affiliation: ergSol, Inc.

Subject: Funding Demonstration Projects for the Use of Advanced Solar Thermal Technologies
Comment:

```
ergSol applauds the California Air Resources Board for initiating
this public forum for input and our company respectfully provides
comments on
Energy Conservation/Efficiency:
Funding Demonstration Projects for the Use of Advanced Solar
Thermal Technologies in New Heating and Cooling Applications
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/42-ergsol_comments_on_the_development_fo_the_cap-and-trade_auction_proceeds_investment_plan.pdf

Original File Name: ergSol Comments on the Development fo the Cap-and-Trade Auction Proceeds Investment Plan.pdf

Date and Time Comment Was Submitted: 2013-02-26 17:43:54

No Duplicates.

Comment 32 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Keri
Last Name: Lung
Email Address: klung@midpen-housing.org
Affiliation:

Subject: Investment Plan for Cap and Trade Auction Revenues
Comment:

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

RE: Investment plan for cap and trade auction revenues

Dear Chair Nichols:

MidPen Housing Corporation is one of more than 40 organizations that has signed on to the Sustainable Communities for All proposal which would direct cap and trade auction revenues to building and preserving affordable homes near transit, public and active transit options, and energy efficiency and sustainable energy resources for multifamily homes affordable to low-income households. The aim of this proposal is to achieve the goals of AB 32 and SB 375 equitably by providing transportation and housing choices that allow all Californians to drive less and reduce household costs, especially for low- income households. On behalf of MidPen Housing, I urge you to include these strategies in the investment plan for cap and trade auction revenues.

MidPen Housing is one of the nation's leading non-profit sponsors and developers of affordable rental housing for low-income working families, seniors, and persons with special needs. Since our founding in 1970, we have developed over 7,000 affordable homes in ten Bay Area counties, housing more than 14,250 residents.

California's transportation sector is responsible for the most emissions of any sector, 38%, making it an important focus. Because transportation needs are driven in large part by where people want - and can afford - to live, housing affordability directly affects the sector’s emissions. Investment in the sustainable development and preservation of affordable housing will significantly reduce vehicle miles traveled and help the state meet its greenhouse gas reduction goals while also benefiting disadvantaged communities pursuant to the requirements of SB 535.

• Low-income households are the most likely to shed their cars and ride transit when given the opportunity to live near a robust transit line. They are also the most likely to be displaced when rising property values near new transit lines drive up rents. This displacement robs the transit system of ridership and reduces its GHG benefits.
• By taking existing public transportation instead of driving a

car, a single person prevents 4,800 pounds of CO2 from entering the atmosphere each year.
• Lower income households use 28% more energy per square foot than higher-income households primarily because they live in older, less energy-efficient homes. Energy efficiency and sustainable energy investments in low-income multifamily properties provide an excellent opportunity to reduce greenhouse gas emissions, improve public health, and lower operating costs to residents and building owners, helping to preserve affordable rents and provide financial relief.

There are several existing state programs which could be use to promote investment in these areas:
1. The California Department of Housing and Community Development's (HCD) Multifamily Housing Program (MHP) and affordable Transit-Oriented Development (TOD) program
2. The Energy Savings Assistance Program, Weatherization Assistance Program, and the Multifamily Affordable Solar Homes Program
3. The State Transit Assistance Program and proposed Active Transportation Program

Cap and trade auction revenues are a critical resource, since substantial state and federal reductions in funding for transportation and affordable housing threaten the ability of communities to achieve AB 32 and SB 375 goals. Therefore, we urge you to direct a significant percentage of the revenues to improve clean transportation choices, build and preserve homes affordable to low-income households near transit, and invest in energy efficiency and sustainable energy improvements to multifamily homes affordable to low-income households.

We thank you for the opportunity to provide this input.

Sincerely,

Keri Lung
Director of Housing Development

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-27 10:09:30

No Duplicates.

Comment 33 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Nurit
Last Name: Katz
Email Address: nkatz@facnet.ucla.edu
Affiliation: UCLA

Subject: Letter from UCLA regarding Cap and Trade Auction Proceeds
Comment:

```
Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/44-ucla_carb_letter.pdf

Original File Name: UCLA CARB Letter.pdf

Date and Time Comment Was Submitted: 2013-02-27 10:15:52

No Duplicates.

Comment 34 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Chuck
Last Name: Shulock
Email Address: shulockconsulting@comcast.net
Affiliation:

Subject: Additional points to consider in Draft Concept Paper
Comment:

The investment plan should incorporate the following points. More detailed comments are provided in the attachment.
1. The list of potential uses of funds should be expanded to include the return of auction proceeds to households and/or to offset business taxes.
2. The Governor and the Legislature should establish on a policy basis the aggregate amount of funds to be allocated to short term projects, long term projects, and the return of auction proceeds to households and/or to offset business taxes. Proposals should compete within each category but not across categories.
3. To minimize the potential for legal challenge all funded projects (other than the return of funds to households or businesses) should result in greenhouse gas reductions.
4. In general auction proceeds should be used to reduce overall compliance costs rather than achieve additional reductions beyond those identified in the Scoping Plan.
5. Funding to support near-term reductions (a) should only address emissions from sources not covered under the cap, or sources under the cap that do not respond to the price signal imposed by the cap, (b) should be prioritized based on cost-effectiveness, and (c) should only be provided to projects that achieve reductions at a cost per ton lower than the allowance value (except as modified for SB 535 purposes as noted in the attached detailed comments). Reductions from sources not under the cap should be treated as offsets, or alternatively additional allowances should be created within the cap in an amount equal to the reductions achieved from the uncapped sources.
6. Long term strategies should focus on transport electrification, VMT reduction/land use, and energy efficiency/renewables, and should be evaluated on the basis of return on investment (cost/benefit analysis), taking into account the full range of societal and private benefits accrued.

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/45-response_to_arb_request_for_public_input_on_draft_concept_paper__shulock.docx

Original File Name: Response to ARB Request for Public Input on Draft Concept Paper, Shulock.docx

Date and Time Comment Was Submitted: 2013-02-27 11:19:45

No Duplicates.

Comment 35 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ruth
Last Name: Lorain
Email Address: lorain.ruth@gmail.com
Affiliation:

Subject: AB32
Comment:

Thank you for accepting these comments on the Cap-and-Trade Auction Proceeds Investment Plan Concept Paper. The best use of revenues from an auction of permits under the AB32 cap-and-trade program is to return auction proceeds to the public through a dividend. The Economic and Allocations Advisory Committee (EAAC) recommended that "the largest share (roughly 75%) of allowance value should be returned to California households… through lump-sum payments…" and "roughly 25% of this value used to finance socially beneficial investments and other public expenditures." Dividends accomplish the AB32 goals relating to equity, and maximizing additional environmental, economic, and overall societal benefits.

Although rebates are already being proposed for the electricity sector, those rebates will not compensate consumers for costs from transportation fuels and indirect costs from other goods and services that are passed through as energy costs rise. When the transportation sector enters the program in 2015, consumers will see a very visible hit to their pocketbooks. The best way to defuse a potential political backlash is to include a dividend for transportation sector and indirect costs in the Investment Plan.

Some investments are expensive and may not result in reduced emissions until after 2020. That said, if the State follows the 75% dividends and 25% investments model recommended by the EAAC, some positive investment projects would include local government activities that reduce GHGs, financing programs that leverage private capital for energy efficiency (i.e. PACE financing for building energy efficiency and on-bill financing), activities that reduce the carbon content of water treatment and delivery, projects in disadvantaged communities (i.e. school bus retrofits), market transformation and R&D programs (i.e. distributed generation, micro-grids, web-enabled transportation information and networking systems), and biochar carbon sequestration in the agricultural sector.

Most importantly, please include dividends in the Auction Proceeds Investment Plan.

Sincerely,
Ruth Lorain

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-27 13:07:47

No Duplicates.

Comment 36 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: C.
Last Name: Corliss
Email Address: corlissc@emwd.org
Affiliation: Eastern Municipal Water District

Subject: Investment Plan for Auction Proceeds from California Cap and Trade Program
Comment:

```
See attached comments.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/48-9931_2013-02-27_-_cc_-_ca_air_res_bd_investment_plan_auction_proceeds_s.pdf

Original File Name: 9931 2013-02-27 - CC - CA Air Res Bd Investment Plan Auction Proceeds_s.pdf

Date and Time Comment Was Submitted: 2013-02-27 14:33:47

No Duplicates.

Comment 37 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kristin
Last Name: Reutimann
Email Address: kristin.reutimann@gmail.com
Affiliation:

Subject: Please Support Increased Funding for Sustainable, Healthy, Zero Emission Active Transit
Comment:

Dear members of the CA Air Resources Board,

As a constituent deeply concerned about issues of public health and safety, including the health impacts of automobile dependence and poor air quality, I urge you to set aside some of these new revenues to improve the bike and walk-ability of our neighborhoods.

As you know, there is very little transportation funding designated for active transportation projects, despite their growing modal share. Indeed, 15% of our total trips are walking or on a bike, yet only about 1% of our transportation funds are spent on bike and pedestrian infrastructure.

Making matters worse, federal spending on active transportation was recently cut by 33%. Please begin to rectify this situation by providing designated state funding for bicycle and pedestrian projects.

Thank you for your time and consideration,

Kristin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-27 16:29:04

No Duplicates.

Comment 38 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: William
Last Name: Miller
Email Address: Wwilly72@aol.com
Affiliation:

Subject: Cap and Trade Auction Proceeds Investment Plan
Comment:

Thank you for the opportunity to address the board last night at the Workshop in Los Angeles. In the interest of brevity I didn't express all my ideas in my address. Here are all of them in brief.

I suggest that no proceeds go towards any combustion power entity, be it generation,transportation,distilling or refining.I feel that contradicts the core goal of the plan by returning some of the funds to the entities that purchased them.

The 10%(to be invested in projects located within the disadvantaged communities) should be a part of the 25%(directed to projects that benefit disadvantaged communities). Funding not spent ,or improperly spent, in these areas in the course of the fiscal year should be reallocated to others that are on or ahead of schedule to be implemented. This removes the backlog of monies unspent to further the cause. Also this compells the communities to use the funds expeditiously and correctly.

Also, there should be a limit on decorative landscape irrigation for all properties. Businesses also should not be allowed to write off landscape irrigation as a business expense on state and federal tax forms. If there is no financial driver then business won't change procedure. This would generate some tax revenue and decrease water usage across the board.

The light rail systems all across California might want to follow the lead of Portland,Oregon and allow free or at least lower fare use of trains on weekends to increase familiarity with rail use and more customers to businesses along the routes on non-officework days.

Lastly, perhaps one project to consider would be to convert the trains that cross the Tehachapi Pass to electric. This would address several requirements. Funding would benefit the disadvantaged communities in the northern L.A. county and southern Kern county. This section of track will be used extensively during the construction of the High Speed rail line. And this would reduce pollution, because due to the steep rate of climb, the diesels in use now use more fuel than any other section of rail in the state.
Thank you, William Miller
(310-776-0187)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-28 11:43:18

No Duplicates.

Comment 39 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jim
Last Name: McDermott
Email Address: jim@usregroup.com
Affiliation:

Subject: Comments on Draft Concept Paper titled, “Cap-and-Trade Auction Proceeds Investment Plan”
Comment:

```
Dear Livingston,

Attached are USRG's comments on the Draft Concept Paper titled,
“Cap-and-Trade Auction Proceeds Investment Plan”.

Should have any questions, please feel free to contact me at your
convenience.

Jim McDermott
Managing Partner
US Renewables Group
2425 West Olympic Blvd, Ste. 4050 West
Santa Monica CA 90404
(d) 310-586-3910
(e) jim@usregorup.com
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/51-usrg_comments_on_cap-and-trade_investment_plan_130301.pdf

Original File Name: USRG Comments on Cap-and-Trade Investment Plan 130301.pdf

Date and Time Comment Was Submitted: 2013-02-28 14:17:49

No Duplicates.

Comment 40 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Christopher
Last Name: Escarcega
Email Address: chris.escarcega@gmail.com
Affiliation:

Subject: Revenues should be used to reduce emissions
Comment:

```
Revenues raised from cap and trade ought to pay for programs that
reduce the amount of greenhouse gases in the atmosphere, including
long-term investments that lead to reduced dependency on the
automobile.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-02-28 18:17:34

No Duplicates.

Comment 41 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Lynn
Last Name: France
Email Address: lfrance@chulavistaca.gov
Affiliation: California Resource Recovery Association

Subject: Waste Reduction Funding in Cap-and-Trach Auction Proceeds Investment Plan
Comment:

```
Attached is a letter from the California Resource Recovery
Association strongly supporting investing a portion of the
Greenhouse Gas Reduction Fund in (a)recycling market development,
and (b)organics processing.

Thank you for the opportunity to participate in the decision making
process.

Sincerely,
Lynn France
Policy Chair,
California Resource Recovery Association
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/59-cap_n_trade_crra_letter_3_1_13_signed.pdf

Original File Name: Cap n trade CRRA letter_3_1_13_signed.pdf

Date and Time Comment Was Submitted: 2013-03-01 14:21:29

No Duplicates.

Comment 42 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Milt
Last Name: McGiffen
Email Address: milt@ucr.edu
Affiliation: University of California, Riverside

Subject: Southern CA clientele see themselves as underserved
Comment:

```
I think that it is very forward thinking to plan how to spend the
cap-and-trade money. What I am hearing from my clientele is that
these programs go to research and outreach for northern CA.

We do have research going on in the area at UCR and I do pass
outreach to disseminate the results, but none of the funding has
come from ARB.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-01 19:27:23

No Duplicates.

Comment 43 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dan
Last Name: Silver
Email Address: dsilverla@me.com
Affiliation: Endangered Habitats League

Subject: Comments on ARB Draft Investment Plan
Comment:

March 3, 2013

California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on ARB Draft Investment Plan

Dear Air Resources Board:

Thank you for the opportunity to comment on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan). The Endangered Habitats League (EHL) is Southern California's only regional conservation group. We have been active since 1991 in State of California Natural Communities Conservation Planning (NCCP).

1. We support better alignment with AB 1532's mandates as it relates to natural resources and conservation strategies as a mechanism to reduce emissions.

The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions (GHG) through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of GHG emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the GHG Reduction Fund shall appropriate funds towards one of several items, including the reduction of GHG emissions associated with water use and supply, land and natural resources conservation and management, forestry, and sustainable agriculture. Yet, not a single conservation strategy is outlined in the Investment Plan that furthers this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions.

2. There are numerous benefits and co-benefits associated with using land conservation as a means to reduce greenhouse gas emissions.

• By protecting natural resource lands the "threat" of land conversion to more urban uses is removed. Development is directed at more urban areas and not at the Wildland-Urban Interface. In many cases there are existing conservation plans and programs that

are supported at the local, regional, statewide and national levels by agencies, landowners and non-profit organizations that provide a suitable framework to achieve habitat conservation.

• Natural lands provide significant abilities to sequester carbon. In fact, the National Science Foundation and U.S. Department of Energy commissioned a study that showed forests and other terrestrial ecosystems can sequester 40% of the nation's carbon emissions—up from the previous estimate of 30% (See Science News Daily (SND). "Carbon Sequestration Estimate in US Increasing, Barring A Drought." Retrieved 16 Jan 2013 from the SND website: http://www.sciencedaily.com/releases/2011/04/110414131851.htm).

• While existing protected lands offer benefits in terms of emissions reductions, through appropriate restoration and enhancement efforts these benefits can be multiplied. The United States Fish and Wildlife Service through a Climate Change Strategy studied the effects of extensive restoration on a Southeastern wildlife refuge. By planting more than 22 million trees, more than 33 million tons of carbon will be captured over the next 90+ years (See United States Fish and Wildlife Service. "Service Releases Climate Change Strategy for Public Review and Comment." Retrieved 16 Jan 2013 from the USFWS website: http://www.fws.gov/southeast/news/2009/r09-050.html).

3. Habitat lands offer carbon sequestration benefits that equate to removing passenger cars from roadways.

Plants naturally absorb carbon dioxide (CO2) from the atmosphere and through photosynthesis it is stored as carbon. Plants release oxygen into the atmosphere as a by-product of this process. The carbon is stored (or sequestered) in the plants' branches, tree trunks, roots and in the soil. This process is known as carbon sequestration. Our natural lands are "carbon sinks" storing GHG emissions that would have otherwise been released into the atmosphere with conversion to more intensive uses (such as residential, commercial and industrial development). Research has already been done in California that furthers this assertion. East Bay Regional Parks District, for example, determined the average amount of CO2 sequestered annually by the District's 98,600 acres of protected natural lands is estimated to be 91,157 metric tons (Mt). This also equates to removing 16,317 passenger cars from the roadways annually. (See East Bay Regional Park District (EBRPD). EBRPD Carbon Sequestration Evaluation. Retrieved 16 Jan 2013 from the EBRPD website: http://www.ebparks.org/Assets/files/ebrpd_carbon_seq_study_2008.pdf).

4. Habitat lands offer carbon avoidance benefits that would NOT have happened if the land was converted to more urban uses.

It seems there is a natural opportunity to use land conservation to avoid increasing the amount of carbon emissions from land development and transportation activities (aka carbon avoidance). Avoidance benefits are multifactorial in origin. At the outset, preservation of land averts the release of stored (sequestered) carbon from vegetation and soil that otherwise would be released due to grading and land disturbance. The GHG impacts from construction are also avoided. Then, over the long term, the automotive emissions that would have come from vehicle miles traveled (VMT) from residential and commercial uses are avoided.

Thank you for your time and the opportunity to provide feedback to

the Air Resources Board on the Draft Investment Plan.

Sincerely,

Dan Silver
Executive Director

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-03 12:41:26

No Duplicates.

Comment 44 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Charlotte
Last Name: Pirch
Email Address: dpirch@socal.rr.com
Affiliation:

Subject: Comments on the ARB Draft Investment Plan
Comment:

I support better alignment with AB 1532's mandates as it relates to natural resources and conservation strategies as a mechanism to reduce emissions. The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions (GHG) through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of GHG emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the GHG Reduction Fund shall appropriate funds towards one of several items, including the reduction of GHG emissions associated with water use and supply, land and natural resources conservation and management, forestry, and sustainable agriculture. Yet, not a single conservation strategy is outlined in the Investment Plan that furthers this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-03 12:59:12

No Duplicates.

Comment 45 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mark
Last Name: Schleich
Email Address: schleich@cosbpw.net
Affiliation: County of Santa Barbara

Subject: Comment on Cap and Trade Auction Proceeds Investment Plan
Comment:

```
Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/64-carb_cap_and_trade_comments_from_schleich_2013.pdf

Original File Name: CARB Cap and Trade Comments from Schleich 2013.pdf

Date and Time Comment Was Submitted: 2013-03-04 09:25:52

No Duplicates.

Comment 46 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Sally
Last Name: Fee
Email Address: sally.fee@fme-arch.com
Affiliation:

Subject: Support for Sustainable Communities for All
Comment:

```
We join CHPC in support of Sustainable Communities for all and
encourage you to use funds from the Cap and Trade auction revenues
to benefit them.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/65-arb_comment_letter.docx

Original File Name: ARB comment letter.docx

Date and Time Comment Was Submitted: 2013-03-04 10:47:10

No Duplicates.

Comment 47 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Debra
Last Name: Hale
Email Address: debbie@tamcmonterey.org
Affiliation: Transportation Agency for Monterey Count

Subject: Cap-and-Trade Auction Proceeds Investment Plan Comments
Comment:

On behalf of the Transportation Agency for Monterey County, I would like to comment on your proposal for investment of Cap-and-Trade Auction Proceeds.

Given that transportation sources will be paying the largest share of these revenues, via fuels, and that transportation emissions represent a major share of greenhouse gas emissions, we support the Transportation Coalition's proposal to assure that a fair share of funding be returned to transportation projects. We also ask that the funding be distributed fairly throughout the state, in recognition that every region can play a role in reducing greenhouse gas emissions, and that every region will be paying the cost of the Cap-and-Trade program. Our key comments are expanded upon below.

Devote the majority of funding to regional transportation projects. Agencies such as ours have been tasked with developing plans under SB 375 to reduce vehicle miles traveled and support increased bus transit, rail service, bicycling and walking. There is, however, very little funding to implement these projects. The Cap-and-Trade proceeds represent the first new significant share of state transportation funding since the Proposition 1B bonds were approved in 2006. Our agency urges you to devote the lion's share of the Cap-and-Trade funds to transportation projects that will reduce vehicle miles traveled, selected by the regional transportation planning agencies to assure a fair distribution of funds statewide.

For example, in Monterey County we are working with the Capitol Corridor to extend rail service to our largest city, Salinas, so that our workers can travel to jobs in Silicon Valley. We request that Cap-and-Trade funding be made available to make such rail connectivity projects possible to provide not only cost effective regional service, but also link to High Speed Rail.
Additional bus service, bicycle and pedestrian improvements will be proposed in our upcoming Sustainable Communities Strategy for the Monterey Bay Area, but most of these projects cannot be built without funding such as that generated from the Cap-and-Trade program.

Assure that "disadvantaged" populations include the low income Salinas Valley. We are very concerned that that there are no disadvantaged populations shown on your map within Monterey County and we request a modification accordingly. While most people think of Monterey County being a high income coastal community,

unfortunately, the Salinas Valley is home to a very poor population. This population includes farmworkers, as well as hotel workers who commute to the coast. In 2009, nearly 31% of our population was below the poverty level, well below the 19.1% poverty rate in the State of California at the time. Additionally, nearly half of all residents are classified as "food insecure" with incomes below 200% of the poverty level. Furthermore, these populations experience high levels of pesticide exposure, one of your measures of environmental disadvantage. Based on these statistics, we ask that you update your definition of "disadvantaged" populations so that you can allocate our region and others like it a fair share of state investment of cap and trade funds.

If the Air Resources Board can implement our recommendations, we can respond to your call for investing in more rail, bus and active transportation options to serve these disadvantaged populations and others in the Monterey Bay Area, and begin the process of reducing greenhouse gas emissions throughout the State of California.

Sincerely,

Debra L. Hale
Executive Director

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-04 12:19:24

No Duplicates.

Comment 48 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Celia
Last Name: Kutcher
Email Address: celia552@cox.net
Affiliation: Orange Co. Chapter, California Native P

Subject: Cap-and-Trade Draft Investment Plan
Comment:

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See comment letter attached.  Thank you.
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Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/67-ltr_re_cap___trade_funds.pdf

Original File Name: ltr re cap & trade funds.pdf

Date and Time Comment Was Submitted: 2013-03-04 12:57:46

No Duplicates.

Comment 49 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Devi
Last Name: Peri
Email Address: devi.peri@marinsanitary.com
Affiliation: Marin Sanitary Service

Subject: Investment Plan for CA AB 32 Cap-and-Trade Auction Proceeds
Comment:

```
It is very important to expand CA recycling markets and
infrastructure:

o   Expand the existing Recycling Market Development Zone (RMDZ)
program
o   Increase performance based-investment incentives for recycling
processing and recycled-content manufacturing, building on the
model of California’s successful Plastic Market Development
Program
o   These actions would spur economic development, create jobs, and
reduce direct and lifecycle GHG emissions

Also very important to expand CA processing of yard trimmings, food
scraps, and other organic materials:

o   Reduce landfill methane emissions by providing incentives for
increasing composting and digestion
o   Applying compost to California soils improves carbon storage,
reduces use of chemical fertilizers and their associated emissions,
and decreases energy-intensive water use

Thank you for your consideration.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-04 14:13:23

No Duplicates.

Comment 50 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jean
Last Name: Bonander
Email Address: jeanbonander@gmail.com
Affiliation: California Street Light Association

Subject: AB 32 Cap and Trade Auction Proceeds Investment Plan
Comment:

```
Please see the attached letter dated March 4, 2013.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/69-calsla_cepa.pdf

Original File Name: calsla cepa.pdf

Date and Time Comment Was Submitted: 2013-03-04 15:29:11

No Duplicates.

Comment 51 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ceil
Last Name: Scandone
Email Address: ceils@abag.ca.gov
Affiliation: Bay Area Green Business Program/ABAG

Subject: CA Green Business Program - Eligibility for Cap and Trade Funding
Comment:

The California Green Business Program http://www.greenbusinessca.org/ (CA GBP) was established by AB 913 in 2011. The legislation conferred official state recognition on the local government-based Green Business Programs (GBP) operated by cities and counties across the state that serve small and medium businesses. Programs currently operate in the 9 San Francisco Bay Area counties; 3 Monterey Bay Area counties; Santa Barbara, Humboldt and Ventura counties; and the cities of Santa Monica and Thousand Oaks. The City of Los Angeles plans to launch a program soon. Collectively these programs cover 38% of California's population.

Since the first GBPs were established in 1996, local GBPs have served thousands of small businesses. The Program criteria require that businesses be in compliance with all environmental regulations, and also meet "beyond compliance" standards to conserve energy and water, reduce waste, and prevent pollution. (sample checklist attached). The measures they take reduce greenhouse gas emissions.

As regional coordinator for the 9 San Francisco Bay Area county-based GBPs, we respectfully request that the local programs operated by members of the CA GBP be eligible for funding from cap and trade auction proceeds. The funds would be used to sustain and expand existing GBPs, launch new GBPs to serve businesses in more California communities, and support the statewide database used by all CA GBP members to manage the certification process, and report environmental outcomes.

Here are some reasons why.

Green Business programs make a substantial, direct, and documented contribution towards meeting AB 32 objectives. They capture data that quantify conservation successes and convert them to ghg emissions reductions. Local governments that operate GBPs can count those reductions towards meeting their climate protection goals.

GBPs connect the businesses they serve with local, regional and state resources, such as energy and water conservation incentives; recycling and pollution prevention services; and CARB's Cool California calculator. They verify on site that businesses meet the standards before certification.

Helping businesses become more efficient saves them money. That

contributes to their overall success, and strengthens local economies. Healthy small businesses create jobs and provide the services and character that define sustainable communities. In this way the Program contributes to meeting the goals of SB 375. Many businesses GBPs serve are in economically disadvantaged communities. Greener practices make them better neighbors in often disproportionately pollution-impacted neighborhoods, while providing green jobs opportunities.

Businesses served by the GBP are centers of innovation that show a high degree of adaptability. Introducing them to greener practices has a multiplier effect. They recruit and mentor aspiring green businesses. Businesses who implement green practices at work take those practices home.

Business demand in many GBPs is outstripping staff capacity. That has occurred without a robust recruiting effort. Funding from auction proceeds would help local Programs meet current needs and aggressively recruit and serve additional businesses. That funding would also support maintenance and enhancement of the database that serves the local programs throughout the state to improve the user experience, ensure that the metrics continue to be compatible with CARB's and CalRecycles' metrics, and keep pace with new program requirements.

Green Business Programs play a direct and important role in helping small and medium businesses reduce greenhouse gas emissions and succeed financially. We respectfully request that local Green Business Programs be eligible for cap and trade funding so that we can continue our work, expand to new communities, and help thousands more businesses throughout the state succeed.

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/70-office_retail_-_bay_area_8_2012.pdf

Original File Name: Office_Retail - Bay Area 8 2012.pdf

Date and Time Comment Was Submitted: 2013-03-04 16:09:37

No Duplicates.

Comment 52 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ivette
Last Name: Rodriguez
Email Address: ivetter@midvalleydisposal.com
Affiliation: Mid Valley Disposal

Subject: Recycling
Comment:

```
I attended the workshop in Fresno. I was wondering if at this point
grants were planned for processing green waste organics or
recyclables in a way that willr reduce emissions.

We have a plan to expand our facility to process organics with a
Gore covered system. This system release less emissions than
composting or digester.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-04 17:32:33

No Duplicates.

Comment 53 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 54 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joyce
Last Name: Blueford
Email Address: blueford@msnucleus.org
Affiliation: Math Science Nucleus

Subject: Cap and Trade (mid size forests)
Comment:

The Math Science Nucleus is a non profit organization that works with children and teenagers to promote science through education and research. We maintain several facilities that revolve around urban forest and private land reforestation. We provide jobs and community service/service learning opportunities for the local schools.

My comments on the Cap and Trade on carbon sequestering are simple. That if funds are being collected they should be used not only to reduce (more efficient transportation), but at least half of the funds should be used to actually take carbon out of the system. The only way to do that is through reforestation, especially with native trees in medium sized areas that have been devoid of their original trees. Projects should consider growth, nutrients (food waste is a good source), and management.

In the San Francisco Bay area, there were forests up to the late 1700's. Most of this land can be reforested effectively over time (10-20 years), and really sequestering carbon. These funds could really help gather data on how to do this effectively. We are conducting pioneering reforestation with food waste, and we feel like the type of projects we are proposing need serious consideration and included in the types of projects that will be funded.

Providing funds for Urban Forests are great, but please consider the larger picture of larger areas that will also provide habitat for native animals. Incentatives for private and public-owned land should be considered. Please look at the attached brochure that outlines the type of projects our group would like to see supported.

Joyce R. Blueford, Ph.D. Geologist, Lead Scientist

Attachment:

Original File Name: tree Masonic home brochure.pdf

Date and Time Comment Was Submitted: 2013-03-04 19:41:59

No Duplicates.

Comment 55 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joyce
Last Name: Blueford
Email Address: blueford@msnucleus.org
Affiliation: Math Science Nucleus

Subject: Cap and Trade (mid size forests)
Comment:

The Math Science Nucleus is a non profit organization that works with children and teenagers to promote science through education and research. We maintain several facilities that revolve around urban forest and private land reforestation. We provide jobs and community service/service learning opportunities for the local schools.

My comments on the Cap and Trade on carbon sequestering are simple. That if funds are being collected they should be used not only to reduce (more efficient transportation), but at least half of the funds should be used to actually take carbon out of the system. The only way to do that is through reforestation, especially with native trees in medium sized areas that have been devoid of their original trees. Projects should consider growth, nutrients (food waste is a good source), and management.

In the San Francisco Bay area, there were forests up to the late 1700's. Most of this land can be reforested effectively over time (10-20 years), and really sequestering carbon. These funds could really help gather data on how to do this effectively. We are conducting pioneering reforestation with food waste, and we feel like the type of projects we are proposing need serious consideration and included in the types of projects that will be funded.

Providing funds for Urban Forests are great, but please consider the larger picture of larger areas that will also provide habitat for native animals. Incentatives for private and public-owned land should be considered. Please look at the attached brochure that outlines the type of projects our group would like to see supported.

Joyce R. Blueford, Ph.D. Geologist, Lead Scientist

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/74-tree_masonic_home_brochure.pdf

Original File Name: tree Masonic home brochure.pdf

Date and Time Comment Was Submitted: 2013-03-04 19:41:59

No Duplicates.

Comment 56 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mike
Last Name: Muller
Email Address: mikemuller@biogas2.com
Affiliation:

Subject: Use of Cap and Trade Revenues
Comment:

```
Hello,
an hour or so ago I sent a message and attached the wrong file.
Please disregards my previous transmittal and use this attachment.

Thanks you.

mike
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/75-biogas_equity_comments_on_ct_revenues_-_3_4_13_cw_edits-1.docx

Original File Name: BIOGAS Equity comments on CT revenues - 3 4 13 CW edits-1.docx

Date and Time Comment Was Submitted: 2013-03-04 21:07:35

No Duplicates.

Comment 57 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kristin
Last Name: Essner
Email Address: kessner@octa.net
Affiliation: OCTA

Subject: Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Submitting comment letter from OCTA to Chairwoman Nichols,
regarding the Cap-and-Trade Auction Proceeds Investment Plan Draft
Concept Paper
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/76-3-4-13-nichols_ltr-cap-trade_auctionproceeds.pdf

Original File Name: 3-4-13-Nichols ltr-Cap-Trade AuctionProceeds.pdf

Date and Time Comment Was Submitted: 2013-03-05 08:51:20

No Duplicates.

Comment 58 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Sylvia
Last Name: Plummer
Email Address: sylviavplummer@gmail.com
Affiliation:

Subject: Cap and Trade Program
Comment:

```
The public should have an opportunity to weigh in on the method for
distributing funding from the state agency level, once allocation
levels are determined.
We should be promoting Public Transportation and getting the public
out of their cars  No more new highways or Freeways.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-05 08:50:43

No Duplicates.

Comment 59 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Paula
Last Name: Shatsky
Email Address: Paulashatsky@yahoo.com
Affiliation:

Subject: Distribution of funds to controversial undecided projects (710)
Comment:

```
1. Please consider NOT distributing funds to any project such as
the proposed 710 tunnel toll project in the San Gabriel Valley,
before all scientific information has been submitted and reviewed
by the public as well as Board of Supervisors. This is vital to
insure safety and and transparency.


Thank you!

Paula Shatsky
Pasadena, Ca.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-05 09:06:36

No Duplicates.

Comment 60 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Greg
Last Name: Stevens
Email Address: gregorydstevens@yahoo.com
Affiliation:

Subject: Where to invest cap-and-trade funds
Comment:

Hi:

I'm writing to express support for investing cap-and-trade funds solely in active transportation solutions (public transportation, biking and walking). I'm a professor of public health at USC and understand first hand the importance to health and a sense of community of investing in infrastructure that supports active transportation (particularly in lower income neighborhoods).

Just to give a specific, simple example. I happen to live in one of these lower-income (but up-and-coming) neighborhoods of Los Angeles (Highland Park). My neighbors, my wife and I have talked about how we would love to walk to close-by facilities (a restaurant, coffee shop, pharmacy, and local hardware store) but often choose not to simply because the sidewalks are deteriorating, or because we have to walk along one of the busiest streets in our community (Ave. 64) and it's simply not enjoyable to have cars racing by just feet from you, while you're walking.

If cap-and-trade funds were used to repair sidewalks or ideally extend the width of sidewalks by a foot or two, or add bike-lanes (or a planted birm) as a buffer between pedestrians and cars, we would all feel more comfortable walking those many weekly short trips instead of driving. We love the bus-stop close to our homes and helping to make more options like light rail available (instead of something like the proposed 710 tunnel) would do so much more for our communities and public health.

Thanks very much for the opportunity to comment and your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-05 10:38:19

No Duplicates.

Comment 61 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Carol
Last Name: Teutsch
Email Address: cbteutsch@comcast.net
Affiliation: Concerned citizen, MD

Subject: Assuring Auction money from CAP and TRADE reduces GHG
Comment:

I am very concerned that giving the Cap and Trade money to Caltrans to spend will mean we will get more freeways and tunnels (i.e. the 710 tunnel which is an environmentally irresponsible project they keep pushing forward) leading to more induced demand, more congestion, more loss of mobility in the region. I think the claims that more freeways will reduce congestion is UNSUPPORTED by scientific evidence and experience of all who drive in LA. They ignore induced demand and newer models of congestion modeling. The money decisions should have an independent party of scientists involved (not always so easy to find since even universities get significant transportation dollars)---and informed and active citizens. After all, it is our air, we live here, and we pay for it with taxes. The emphasis of investment should be public transit and active transportation which is not what is happening now with SCAG, Metro and Caltrans. We should not be cutting bus service.....we should be creating incentives to use buses and rewarding those who do.
Freeways make health hot spots; goods movement create health problems and we need to find better solutions.....not the same old.
 I feel that we need an entirely new process for making investments in transportation infrastructure that is not corrupted and biased and unaccountable as our current agencies seem to be.
I would be happy to be invovled further with my medical background and interest in the environment.
Carol Teutsch, M.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-05 11:27:00

No Duplicates.

Comment 62 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Edward
Last Name: Taylor
Email Address: edbobtaylor@verizon.net
Affiliation:

Subject: Proceeds from the Cap and Trade program
Comment:

As a concerned California citizen, I believe the majority of the proceeds from the Cap and Trade program should be invested in transitioning the state transportation system from a road centric and car centric system to one that prioritizes public transportation and alternative modes of transportation, such as bike commuting and walking. I believe that by investing in relatively inexpensive improvements, such as complete streets and separated bike lanes, the State can help entice people from their cars and into lower cost modes. Investment in better public transportation would do the same. Investments in Bus Rapid Transit and light rail would make commuting easier and cheaper for California citizens in the long run. Spending money on widening freeways and upgrading roads for more cars is a waste - California should use this opportunity to get ahead of the curve and move beyond the single user automobile.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-05 13:18:58

No Duplicates.

Comment 63 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Meea
Last Name: Kang
Email Address: meea@domusd.com
Affiliation: Domus Development, LLC

Subject: Cap-and-Trade: Support for Sustainable Communities for All Proposal
Comment:

```
As President and Co-Founder of Domus Development, I write to
express our support for the Sustainable Communities For All
proposal, which would direct a portion of cap-and-trade auction
revenue to building and preserving affordable homes near transit,
increasing public and active transit options, and providing energy
efficiency and sustainable energy resources for multifamily homes
affordable to low income households. Please review the attached
letter of support.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/82-letter_of_support_cap_and_trade_3-5-13.pdf

Original File Name: Letter of Support Cap and Trade 3-5-13.pdf

Date and Time Comment Was Submitted: 2013-03-05 13:35:11

No Duplicates.

Comment 64 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Christy
Last Name: Zamani
Email Address: christy@dayonepasadena.org
Affiliation: Day One, Inc.

Subject: Public Comment on Behalf of Day One, Inc.
Comment:

```
Please see attached formal letter of public comment.

Thank you,

Christy Zamani
Executive Director, Day One
175 N. Euclid Ave.
Pasadena, CA 91101
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/83-2013.03.04-carbcap-and-tradefunding-dayonepubliccomment.pdf

Original File Name: 2013.03.04-CARBCap-and-TradeFunding-DayOnePublicComment.pdf

Date and Time Comment Was Submitted: 2013-03-05 14:01:22

No Duplicates.

Comment 65 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ann
Last Name: Kelley
Email Address: ann.i.kelley@att.net
Affiliation:

Subject: 710 Tunnel proposal
Comment:

```
I don't begin to understand the technicalities of this project but
if funding is going to be given because the project ostensibly will
improve the air quality shouldn't some sort of proof be provided to
substantiate that claim prior to writing the check?  Shouldn't some
scientific oversight be required to determine the validity of the
claims rather than assume that they are true?  I'm appalled that
Metro will receive funds because they "say" that this rediculus
project will reduce GHG's.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-05 14:04:41

No Duplicates.

Comment 66 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kerry
Last Name: Doi
Email Address: kerrydoi@pacela.org
Affiliation: Pacific Asian Consortium in Employment

Subject: Comments on SB 535 Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Pacific Asian Consortium in Employment (PACE)is a non-profit
cpmmunity development organization founded in 1976. PACE is proud
to have been at the forefront of consumer energy use reduction
since 1983.
Attached is our position paper concerning programs and services
that should be funded by proceeds of SB 535.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/85-pace.position.paper.pdf

Original File Name: PACE.Position.paper.pdf

Date and Time Comment Was Submitted: 2013-03-05 14:30:53

No Duplicates.

Comment 67 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Javier
Last Name: Hernandez
Email Address: javier@bikesgv.org
Affiliation: BikeSGV

Subject: Written Comments on behalf of BikeSGV
Comment:

```
Attached please find a letter by Bike San Gabriel Valley Board
President, Vince Chang.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/86-2013.03.05-auction_funding_-_bikesgv_publiccomment.pdf

Original File Name: 2013.03.05-Auction Funding - BikeSGV PublicComment.pdf

Date and Time Comment Was Submitted: 2013-03-05 15:16:04

No Duplicates.

Comment 68 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Don
Last Name: Falk
Email Address: dfalk@tndc.org
Affiliation: Tenderloin Neighborhood Development Corp

Subject: Investment plan for cap-and-trade auction revenues
Comment:

See attached.

Dear Chair Nichols:

TNDC provides affordable housing and services for low-income people in the Tenderloin and throughout San Francisco, to promote equitable access to opportunity and resources.

TNDC is one of more than 50 organizations that has signed on to the Sustainable Communities for All proposal, which would direct a portion of cap-and-trade auction revenues to building and preserving affordable homes near transit, increasing public and active transit options, and providing energy efficiency and sustainable energy resources for multifamily homes affordable to low income households.

California's transportation sector is responsible for 38% of greenhouse gas emissions, more than any other sector. Because transportation needs are driven in large part by where people can afford to live, housing affordability strongly affects the sector’s emissions.

According to a recent report by the California Housing Partnership Corporation, preserving and building affordable homes near transit will allow California to maximize VMT and GHG-reduction benefits of investment in transit infrastructure and transit-oriented development. In addition to reducing greenhouse gas emissions, energy efficiency and sustainable energy investments in low income multifamily homes provide an opportunity to improve public health and lower operating costs to residents and building owners, helping to preserve affordable rents and provide financial relief.

The following existing programs will expeditiously and effectively reduce GHGs through investment in housing, transportation, and energy efficiency: The Affordable Transit-Oriented Development Program, Weatherization Assistance Program, The Energy Savings Assistance Program, the Multifamily Affordable Solar Homes Program and the State Transit Assistance Program and proposed Active Transportation Program

The Sustainable Communities for All proposal will help to achieve the vision of AB 32 and SB 375 equitably by providing transportation and housing choices that allow all Californians to drive less and reduce household costs, especially for low income households. We thank you for the opportunity to provide this

input.

Sincerely,

Donald S. Falk
Executive Director, TNDC

cc: Megan Kirkeby, California Housing Partnership

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/87-c_t_comments_letter.docx

Original File Name: C&T Comments Letter.docx

Date and Time Comment Was Submitted: 2013-03-05 17:21:15

No Duplicates.

Comment 69 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jean
Last Name: Watt
Email Address: greenvision@fhbp.org
Affiliation:

Subject: Comments on the Draft Investment Plan
Comment:

```
Friends of Harbors, Beaches and Parks submits the follow comments
as it relates to the Draft Investment Plan.
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/89-fhbp_comments_to_arb_on_the_draft_investment_plan.pdf

Original File Name: FHBP Comments to ARB on the Draft Investment Plan.pdf

Date and Time Comment Was Submitted: 2013-03-06 08:31:31

No Duplicates.

Comment 70 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michael
Last Name: Wellborn
Email Address: michael@watershednetwork.org
Affiliation: California Watershed Network

Subject: Comments on Investment Plan
Comment:

```
Greetings ~
Please accept the attached comments on the proposed Cap & Trade
Investment Plan from the California Watershed Network.
Regards,
Michael Wellborn
```

Attachment: www.arb.ca.gov/lists/2013investmentpln-ws/90-3-6-13_cwn_comments_on_c_t_imp_plan.pdf

Original File Name: 3-6-13 CWN Comments on C&T Imp Plan.pdf

Date and Time Comment Was Submitted: 2013-03-06 09:37:54

No Duplicates.

Comment 71 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Diane
Last Name: Pitzel
Email Address: dianepitzel@hotmail.com
Affiliation: Riders' Rights

Subject: Non-drivers need to be heard regarding transit issues.
Comment:

California non-drivers should be recognized as those who have DMV records stating that they have no permit or license to drive, but currently hold a California ID only. As a member of this group I understand and truly care about our needs and the faults of employers who are allowed to discriminate against us. I have attended many transit meetings and seminars, and I have often been one of maybe 2 attendees who took public transit to get there. We need recognition as a minority so that we are guaranteed input on decisions that effect us most.
Drivers who wish to take transit are our allies, but, just as we can't fight their parking tickets, we don't want only sometime or "choice" riders determining policies that may end up leaving us out. People who don't drive but don't care about public transit may be included in decisions because they exemplify our freedom to choose, also they assist in promoting alternatives to driving.
Employers discriminate by requiring vehicles of employees who sometimes don't even receive compensation for the benefit of the use of a vehicle that they provide. Read Lobo versus Tamco.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 09:11:29

No Duplicates.

Comment 72 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jonathan
Last Name: Edewards
Email Address: jedewards@gmail.com
Affiliation: Downtown Pasadena Neighborhood Associati

Subject: Cap and Trade Program
Comment:

```
Auction proceeds should not be used for new roadway/widening
projects. Dollars should be focused on improving public
transportation, encouraging active transportation, and repairing
existing roadways and bridges.

Please dedicate a significant percentage of cap and trade revenues
for bike/ped investments that:

-Helps cities to complete and expand bicycle and pedestrian
networks
-Promote first-mile/last-mile connections to transit
-Promote biking and walking access to schools, community and
medical facilities, job and housing centers, and shopping and
retail centers

The cap and trade proceeds need to be dedicated to active
transportation because of a current bias in the system. 15% of our
total trips are walking or on a bike, yet only about 1% of our
transportation funds are spent on bike and pedestrian
infrastructure, and recently, federal spending on active
transportation was cut by 33%.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 10:35:36

No Duplicates.

Comment 73 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kevin
Last Name: Stein
Email Address: kstein@calreinvest.org
Affiliation: California Reinvestment Coalition

Subject: cap and trade proposal comments
Comment:

```
Please see attached for CRC comment letter. Thanks!

Kevin Stein
California Reinvestment Coalition
```

Attachment: www.arb.ca.gov/lists/com-attach/93-2013investmentpln-ws-UzBVMgd2BAhRNlI8.doc

Original File Name: Cap and trade letter 3.6.13.doc

Date and Time Comment Was Submitted: 2013-03-06 11:23:51

No Duplicates.

Comment 74 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: James
Last Name: Sabelis
Email Address: jsabelis@hotmail.com
Affiliation:

Subject: Funding for Bicycle and Pedestrian Project
Comment:

Members of the California Air Resources Board,

Thank you for giving me this opportunity to provide comments on California’s Cap and Trade Program. As a Californian concerned about the health of our communities, I strongly support the goals of AB 32 and SB 375 and am providing comment to encourage you to dedicate a portion of these revenues for bicycling, pedestrian and mass transit projects.

The benefits are clearly many, and the relative cost of such improvements minor when compared to expensive new roadway construction. Please support our state's transition to more sustainable, healthy lifestyles by setting aside funding for projects that integrate physical activity into our everyday lives, especially in disadvantaged communities.

Thank you for your time and consideration,

James Sabelis,
Bicycle commuter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 11:35:47

No Duplicates.

Comment 75 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: John A.
Last Name: Paoluccio PE
Email Address: info@CNFbiofuel.com
Affiliation: CNFbiofuel, Inc.

Subject: CNF torrefied wood
Comment:

Subject: Cap and Trade Funding - Pilot plant TORREFICATION technology

Thank you for the opportunity to suggest projects that have the potential for making substantial reductions to the carbon dioxide concentration in our air.

Investing a portion of the Cap and Trade funds for projects relating to the Torrefication of woody biomass is suggested. Creating a clean burning renewable energy fuel from waste biomass would help advance an emerging technology that holds promise of significantly reducing CO2 and other GHG's.

Using the suns stored energy in sustainable biomass is the most cost effective method of helping California meet it's near term goal of reducing CO2.

See attached.

John A. Paoluccio PE

Attachment: www.arb.ca.gov/lists/com-attach/95-2013investmentpln-ws-VDdUMwd2Aw9VDARb.doc

Original File Name: Cap & Trade Final 3-5-13.doc

Date and Time Comment Was Submitted: 2013-03-06 11:59:21

No Duplicates.

Comment 76 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Alexander
Last Name: Russell
Email Address: alex@manymansions.org
Affiliation:

Subject: investment plan for cap-and-trade auction revenues
Comment:

```
Please find the attached document

Thank you for your time
```

Attachment: www.arb.ca.gov/lists/com-attach/96-2013investmentpln-ws-VTYAZ1IjUS9QN1M9.pdf

Original File Name: Cap-And-Trade Letter_Updated_March 6, 2013.pdf

Date and Time Comment Was Submitted: 2013-03-06 12:08:28

No Duplicates.

Comment 77 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Pamela
Last Name: Evans
Email Address: pamela.evans@acgov.org
Affiliation: Alameda County Green Business Program

Subject: Cap and Trade Auction Proceeds
Comment:

The California Green Business Network members, who are the local and regional coordinators for the local - government operated Programs in the San Francisco Bay Area, Monterey Bay Area and in Santa Monica, Los Angeles, and Thousand Oaks, respectfully request that Green Business Programs that serve small businesses be eligible for funding from auction proceeds.

Green Business programs make a substantial, direct, and documented contribution towards meeting AB 32 ghg emissions reductions objectives. They capture metrics that quantify their conservation successes and convert them to ghg emissions reductions. They help businesses conserve energy, reduce waste and prevent pollution. They connect the businesses they serve with local, regional and state resources, such as utility company and water agency rebate programs, and CARB's Cool California website.

By helping businesses become more efficient, local Green Business Programs save them money that contributes to their overall success, thus strengthening local economies. Successful small businesses are job creators and provide the vital services and character that define healthy neighborhoods and communities. Most businesses served in the Green Business Program are located in low-income communities; their green practices make them better neighbors in these often disproportionately pollution-impacted neighborhoods, while providing green jobs opportunities for these same areas.

Small businesses served by the Green Business Program are significant centers of innovation and show a high degree of adaptability to new, greener practices. Introducing small businesses to greener practices, and encouraging them to do business with other green businesses has a multiplier effect in the community. Businesses are encouraged by local green business programs to recruit and mentor others who aspire to become green businesses. Local businesses who implement green practices at work are able and likely to take those practices home.

Business demand in many local Green Business Programs is outstripping staff capacity. That demand has occurred absent a robust recruiting effort. Additional funding from auction proceeds would help local Green Business Programs meet current needs and aggressively recruit and serve additional businesses. That funding could also support ongoing maintenance and enhancements to the statewide database - the essential tool that serves the entire CAGBP - to improve the user experience and ensure that the metrics are accurate and keep pace with new program requirements.

Thank you for considering these comments.

Pamela J. Evans, Coordinator
Alameda County Green Business Program
(member of the San Francisco Bay Area Green Business Program and
the California Green Business Network)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 15:07:05

No Duplicates.

Comment 78 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kelly
Last Name: Rector
Email Address: kelly.rector@sonoma-county.org
Affiliation: County of Sonoma

Subject: Support Sonoma County's Green Business Program
Comment:

```
Sonoma County's Green Business Program is a valued program for our
local social, environmental, and economic well-being. Our
businesses are becoming more resource efficient and economically
viable as a direct result of the services this program provides.
Please keep this program in mind as you develop an investment plan
for cap-and-trade auction proceeds.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 15:26:22

No Duplicates.

Comment 79 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Staci
Last Name: Heaton
Email Address: sheaton@rcrcnet.org
Affiliation: RCRC

Subject: Initial comments on the proposed Cap-and-Trade Investment Plan
Comment:

```
Attached please find RCRC's initial comments on the proposed
Cap-and-Trade Investment Plan. Please feel free to contact me with
any questions you might have.
```

Attachment: www.arb.ca.gov/lists/com-attach/99-2013investmentpln-ws-ATJXfFZvWScGMQc0.docx

Original File Name: 3-8-13 Cap and Trade Investment comments FINAL.docx

Date and Time Comment Was Submitted: 2013-03-06 15:42:21

No Duplicates.

Comment 80 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Oren
Last Name: Wool
Email Address: info@contactsec.com
Affiliation: Sustainable Enterprise Conference

Subject: Sonoma Green Business Program
Comment:

```
I support the Sonoma Green Business Program. Please continue
funding so they may continue to offer free support and certify
businesses that reduce their reliance upon natural resources.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 16:07:27

No Duplicates.

Comment 81 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kevin
Last Name: Kumataka
Email Address: kevin.kumataka@sonoma-county.org
Affiliation: Green Business Coordinator

Subject: Request of funding for the Green Business Program
Comment:

Hello,

I am writing to you today on behalf of the Sonoma Green Business Program (SGBP). This letter is meant to be brief and just add an additional testimony to the Green Business Regional Coordinator Ceil Scandone's comments.

The purpose of our program is twofold:

1) We serve as a one stop shop for businesses who are looking for resources to lessen their environmental footprint.
2) We recognize small to medium sized businesses that meet the high environmental standards set by the Green Business Program.

This position makes our program an incentives program, which allows us to push businesses to pursue more environmentally friendly practices. Essentially the Green Business recognition acts as a carrot for businesses to achieve. While businesses are trying to meet the measures set forth in our Green Business checklist, we partner with local agencies working towards similar goals. For example in Sonoma County we promote many agencies/departments program such as:
-PG&E for energy efficiency audits and rebate opportunities
-Sonoma County Water Agency for water efficiency audits and rebate opportunities
-Sonoma County Waste Management Agency to help businesses achieve zero waste
-Santa Rosa Water Conservation Division for water efficiency audits, training and rebate opportunities

As the Coordinator for the Sonoma Green Business Program, I respectfully request that the local programs operated by members of the California Green Business Program (CA GBP) be eligible for funding from cap and trade auction proceeds. The funds would be used to sustain and expand existing Green Business Programs (GBP), launch new GBPs to serve businesses in more California communities, and support the statewide database used by all CA GBP members to manage the certification process, and report environmental outcomes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 16:10:30

No Duplicates.

Comment 82 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Merith
Last Name: Weisman
Email Address: merith.weisman@sonoma.edu
Affiliation: Sonoma State University Center for Commu

Subject: Sonoma Green Business Program
Comment:

```
I am writing to offer my support for the funding submission of the
Sonoma Green Business Program. We find their work crucial and have
been partnering with them for many years. We look forward to
continued collaboration and your support will deepen our work.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 16:28:49

No Duplicates.

Comment 83 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mark
Last Name: Berman
Email Address: mjberm@davisenergy.com
Affiliation: Davis Energy Group

Subject: Community PV Garden w Residential Energy Efficiency
Comment:

```
Community Solar Gardens offer the potential to rapidly expand the
development of renewable solar power by enabling homeowners with
limited resources to invest in solar.  When coupled with Home
Energy Upgrades, the results include:

+ Rapid realization of GHG reductions
+ Economic, environmental and health benefits for homeowners
+ Job creation
+ Public/private partnerships

The attachment summarizes an innovative program proposal developed
by Davis Energy Group and the City of Davis that marries
residential energy efficiency upgrades with construction of a
Community Solar Garden.  Funding of this kind of pilot program
would pave the way for development of Community Solar Gardens
across the State and the rapid realization of many of the goals of
AB32, and is recommended for inclusion in the Cap and Trade
Investment Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/103-2013investmentpln-ws-UDNcOwd0VWRVDAFi.doc

Original File Name: CARB_Comm_Scale_Solar.doc

Date and Time Comment Was Submitted: 2013-03-06 16:31:27

No Duplicates.

Comment 84 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Stephen
Last Name: Grealy
Email Address: sgrealy@sandiego.gov
Affiliation: City of San Diego Environmental Services

Subject: Comment on Cap and Trade Investment Plan
Comment:

The City of San Diego Environmental Services Department supports eligible investments in the current draft concept paper (released February 15, 2013), and specifically applauds the inclusion of investments in municipal solid waste diversion through composting. The City strongly supports draft investment principle #7: funding should leverage private and other government investment to the maximum extent possible. Although it is not clear, it appears that these investments could be in the form of matching grants (perhaps even matching up to 50% of project costs) to support a local government's existing or planned project to divert additional organics and recyclables from the landfill, enhance compost processing technology, and expand recycling infrastructure. Increased composting is critical to the City meeting AB341 and AB32 goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 17:02:12

No Duplicates.

Comment 85 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Andrea
Last Name: Gullo
Email Address: agullo@habitatauthority.org
Affiliation: Puente Hills Habitat Preservation Author

Subject: Comments on the ARB Draft Investment Plan
Comment:

March 6, 2013

California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on the ARB Draft Investment Plan

Dear Air Resources Board:

Thank you for the opportunity to comment on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan). We are writing to provide substantive comments on the Draft Investment Plan as it relates to natural resources and conservation.

The Puente Hills Habitat Preservation Authority (Habitat Authority) is a joint powers authority established pursuant to California Government Code Section 6500 et seq. with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.
We support better alignment with AB 1532's mandates as it relates to natural resources and conservation strategies as a mechanism to reduce emissions. The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions (GHG) through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of GHG emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the GHG Reduction Fund shall appropriate funds towards one of several items, including the reduction of GHG emissions associated with water use and supply, land and natural resources conservation and management, forestry, and sustainable agriculture.

However, no conservation strategy is outlined in the Investment Plan that furthers this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions.

Habitat lands offer carbon sequestration benefits that equate to removing passenger cars from roadways. Carbon, found in all living organisms, primarily exists terrestrially as plant biomass and soil organic matter (SOM). Plants naturally absorb carbon dioxide (CO2) from the atmosphere and through photosynthesis it is stored as carbon. Plants release oxygen into the atmosphere as a by-product of this process. The carbon is stored (or sequestered) in the plants' branches, tree trunks and roots. Carbon is either transferred to animals when they eat plants or added to the soil when plants drop their leaves and/or die; decomposing plant and animal matter stores carbon as SOM. This process is known as terrestrial carbon sequestration and soils contain approximately three times more carbon than is stored in living plants and animals; emphasizing the importance of soils in the carbon cycle and carbon sequestration. SOM is ultimately derived from vegetation and habitat management practices can be easily modified to increase carbon sequestration (see Native Plants for Optimizing Carbon Sequestration in Reclaimed Lands by Unkefer et al.) at the following website:
http://www.netl.doe.gov/publications/proceedings/01/carbon_seq/p51.pdf

Research has already been done in California that furthers this assertion. East Bay Regional Parks District, for example, determined the average amount of CO2 sequestered annually by the District's 98,600 acres of protected natural lands is estimated to be 91,157 metric tons (Mt). This also equates to removing 16,317 passenger cars from the roadways annually. (See East Bay Regional Park District (EBRPD). EBRPD Carbon Sequestration Evaluation. Retrieved 16 Jan 2013 from the EBRPD website:
http://www.ebparks.org/Assets/files/ebrpd_carbon_seq_study_2008.pdf).

Habitat lands offer carbon avoidance benefits that would NOT have happened if the land was converted to more urban uses. Our natural lands are "carbon sinks" storing GHG emissions that would have otherwise been released into the atmosphere with conversion to more intensive uses (such as residential, commercial and industrial development). It seems there is a natural opportunity to use land conservation to avoid increasing the amount of carbon emissions from land development and transportation activities (aka carbon avoidance). Avoidance benefits are multifactorial in origin. At the outset, preservation of land averts the release of stored (sequestered) carbon from vegetation and soil that otherwise would be released due to grading and land disturbance. The GHG impacts from construction are also avoided. Then, over the long term, the automotive emissions that would have come from vehicle miles traveled (VMT) from residential and commercial uses are avoided. To this end, environmental documents are analyzing project impacts pursuant to the California Environmental Quality Act. Consultants are more frequently analyzing all of the development related sources of GHG emissions (construction, household, infrastructure, etc.) and VMTs. Utilizing these reports can be the starting point for understanding what carbon avoidance values could be for a proposed development. This analysis was in fact utilized to understand what the carbon emissions would be for a project in Fullerton, CA. The project proposed the conversion of 510 acres of

natural land into 760 houses and a small commercial center. This project, if built, is estimated to have generated the following:

- 8,367 tons of CO2e (e=equivalent) for an annualized total (includes all GHG emitting activities);
- 33,340 tons of CO2e from construction emissions,
- 3,987 tons of CO2e from vehicular emissions, and
- 11,686,804 VMT annually. (See West Coyote Hills Recirculated Draft Environmental Impact Report GHG Emissions Study Completed by ENVIRON, October 9, 2009).

By protecting natural habitat lands the “threat” of land conversion to more urban uses is removed and directed at more urban in-fill areas. The role of habitat lands in carbon sequestration and the reduction of GHG emissions is important and not to be overlooked; especially since it is an effective way to sequester carbon without negative environmental consequences.

Thank you for your time and the opportunity to provide feedback to the Air Resources Board on the Draft Investment Plan.

Sincerely,

Andrea Gullo
Executive Director
Puente Hills Habitat Preservation Authority

Attachment: www.arb.ca.gov/lists/com-attach/105-2013investmentpln-ws-USEFdlczVmsCcAZj.pdf

Original File Name: Puente Hills Habitat Preservation Authority comment letter Cap and Trade.pdf

Date and Time Comment Was Submitted: 2013-03-06 17:08:31

No Duplicates.

Comment 86 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Julie
Last Name: Montgomery
Email Address: juliem@sageprinciples.com
Affiliation:

Subject: Endorsement of the Sonoma Green Business Program
Comment:

Hello,

I would like to submit my endorsement of the Sonoma Green Business Program in Sonoma County. Through their free offerings of support and certification, this program has inspired many Sonoma County businesses to take their first steps into more sustainable business practices. In this time of lingering economic uncertainty, it is imperative that these business have an affordable and guided entry into the path of conserving resources and curtailing pollution. As a business owner going through the program and a consultant helping other businesses achieve their goal of certification, I experience first hand the economic benefits and unexpected enthusiasm that results from businesses participating in the program. I hope you will support this valuable resource in our community.

Sincerely,

~Julie Montgomery

Founder, Sage Principles
www.sageprinciples.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 18:58:29

No Duplicates.

Comment 87 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joanne
Last Name: Brion
Email Address: joanne@brionassociates.com
Affiliation: Brion & Associates, Share Exchange

Subject: Pls support this program
Comment:

```
We need this program, we need lots of programs that get people out
of cars, into more environmental friendly transport, we need
production to be more green, we need carbon sequestering on
ranches....so many possibilities. We need our counties to do green
certifications of businesses.  Joanne
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 20:06:52

No Duplicates.

Comment 88 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Suzanne
Last Name: Barzee
Email Address: sbarzee@gmail.com
Affiliation:

Subject: Invest in Composting
Comment:

I would like to see investment in small businesses that provide food and green waste composting capacity for municipalities that don't currently provide that service.

The California Air Resources Board has estimated that in addition to reducing landfill emission, the application of compost saves .42 net tons of CO2 per ton composted through soil carbon storage, decreased water use and fertilizer use, and decreased soil erosion. Despite landfill gas capture systems, over 6.7 million metric tons of CO2 equivalent fugitive emissions were released from Californiaâ€™s landfills in 2009, according to CARBâ€™s Greenhouse Gas Inventory http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-09_2011-10-26.pdf>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-06 20:57:41

No Duplicates.

Comment 89 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Christine
Last Name: Nota
Email Address: cnota@fs.fed.us
Affiliation: USDA Forest Service

Subject: Comments to Cap and Trade
Comment:

```
Please see attached Comment letter with two enclosures.

Thank You
```

Attachment: www.arb.ca.gov/lists/com-attach/109-2013investmentpln-ws-VjVTNFAhUFxWMVI8.pdf

Original File Name: Cap and Trade Comments and Enclosures.pdf

Date and Time Comment Was Submitted: 2013-03-07 06:47:06

No Duplicates.

Comment 90 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Karl
Last Name: Bruskotter
Email Address: karl.bruskotter@smgov.net
Affiliation:

Subject: green business programs and GHG reductions
Comment:

```
I would like to make you aware of the important role that green
business certification programs play in the reduction of GHG
emissions.  These programs facilitate thousands of small and medium
businesses to reduce energy usage thus reducing GHG emissions,
reduce water use thus reducing GHG emissions, reduce waste thus
reducing GHG emissions, source locally thus reducing GHG emissions
and much more.
These programs should be considered as a critical partner in
achieving California's GHG reduction efforts.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 07:51:22

No Duplicates.

Comment 91 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Rico
Last Name: Mastrodonato
Email Address: rico.mastrodonato@tpl.org
Affiliation: Trust For Public Land

Subject: Investments in Natural Resources From Cap&Trade
Comment:

```
Please see attached letter for our 'public comments' regarding
investments from Cap and Trade auction revenues.

Thanks
Rico
```

Attachment: www.arb.ca.gov/lists/com-attach/111-2013investmentpln-ws-UiZWIARpVFhVPwFk.docx

Original File Name: TPL Letter to the Governor - Final.docx

Date and Time Comment Was Submitted: 2013-03-07 09:06:27

No Duplicates.

Comment 92 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Lorraine
Last Name: Flint
Email Address: lflint@usgs.gov
Affiliation: US Geological Survey

Subject: Suggestions for Climate Change Research
Comment:

The following is a proposed project for research on climate change and energy development in California. Thank you for your consideration. Please contact me with any questions or comments or if you would be interested in a formal proposal.

Identification and prioritization of state lands for energy development

Land availability for renewable energy development to counter greenhouse gas emissions is often in conflict or competition with other land uses in California. We are offering an approach to identify lands that would serve this purpose that are at the highest risk of being impacted by climate change to the point of providing very low returns as a result of conservation or management actions, that also have desirable characteristics for energy development. The USGS and Defenders of Wildlife are currently completing a CA-LCC project that assesses impacts of climate change and land use scenarios on CA rangelands. The research offers evidence for levels of vulnerability and resilience that can be considered by land and resource managers for conservation, acquisition, and optimization of management and financial resources to maintain biodiversity and healthy working landscapes. We'd like to extend this research to the entire state, using risk analyses and modeling of the hydrologic response to climate change and land use scenarios to identify the landscapes and watersheds most vulnerable to climate change that are the least likely to benefit from conservation measures. These would be overlaid with various projections of land use and suitability for development of different energy sources to pose a potential prioritization of lands for consideration for energy development. An outreach and education component would inform and consider land owners and resource managers to optimize collaboration and project success.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 09:23:39

No Duplicates.

Comment 93 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Elyse
Last Name: Lowe
Email Address: elowe@movesandiego.org
Affiliation: Move San Diego

Subject: Recommend investment in affordable housing and TOD
Comment:

Move San Diego is one of more than 50 organizations that have signed on to the Sustainable Communities for All Proposal. We believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

We are a local 501(c)3 nonprofit corporation dedicated to the preservation of San Diego's environment through the design of sustainable transportation, smart transit and improved infrastructure. Through the MOVE Alliance and their endorsements, we promote transit-oriented and affordable housing development.

For us, building homes affordable to lower-income households is key. In San Diego County, there is a deficit of 58,120 units in homes affordable and available to households earning below eighty percent of the area median income.

According to a recent report by the California Housing Partnership Corporation, preserving and building affordable homes near transit will allow California to achieve the maximum VMT and GHG-reduction benefits of investment in transit infrastructure and transit-oriented development.

Here in San Diego County, we've had positive experiences with HCD's Transit-Oriented Development Housing Program; Energy Savings Assistance Program; Multi-family Affordable Solar Homes Program; State Transit Assistance Program; and Active Transportation Program.

Investments like these will have the greatest impact on the communities most affected by climate change while also increasing access to opportunities and improving public health.

Attachment: www.arb.ca.gov/lists/com-attach/113-2013investmentpln-ws-BzUHMVxsVzcDK1Ji.pdf

Original File Name: 2013.03.07 CARB comments letter.pdf

Date and Time Comment Was Submitted: 2013-03-07 10:35:28

No Duplicates.

Comment 94 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Campbell
Last Name: Ingram
Email Address: cingram@deltaconservancy.ca.gov
Affiliation: Delta Conservancy

Subject: Investing in Delta managed wetlands for GHG emissions reductions and economic sustainabili
Comment:

One of the major vulnerabilities of the Sacramento-San Joaquin Delta, and therefore the California Water system and by extension the very economy of California, is the deeply subsided elevations of the Delta land surface, over 25 feet below sea level in some locations, spread over an area of approximately 300,000 acres. Ongoing subsidence of the highly organic peat soils, up to an inch per year that results from current agricultural practices causes carbon emissions of approximately 7 MT/Ac/Yr, which has been estimated to be between 1% and 3% of California's total carbon emissions. Developing managed wetlands through inundation and planting of native reeds can immediately eliminate this emission source. Further, research shows that between 13 and 17 MT/Ac/Yr of carbon can be sequestered in the below ground biomass of the wetlands. Over fifteen years of research indicates that farm scale pilot projects are appropriate at this time. A one time investment of approximately $3,000 per acre would result in a 7 MT reduction in carbon emissions, a minimum of 13 MT carbon sequestered, the prevention of loss of one inch of elevation, the accretion of up to 2 inches of elevation and potential improvements in water quality and biodiversity. These benefits could continue to accrue for over 100 years as land elevations are slowly restored. Managed wetlands in the Delta represent one of the few places where mitigation and critical adaptation can be accomplished simultaneously. The Department of Water Resources is currently looking to develop 1,600 acres of wetlands. In partnership with DWR, USGS, EPA, NGO's and Delta landowners we are working toward a target of an additional 1,000 acres. Willing landowners have been indentified and projects could be designed, permitted and implemented in the near term, resulting in a 7,000 MT/yr emission reduction.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 11:06:47

No Duplicates.

Comment 95 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kellyx
Last Name: Nelson
Email Address: kellyx@sanmateorcd.org
Affiliation: San Mateo County Resource Conservation D

Subject: valuable work of RCDs in reducing GHGs
Comment:

```
Attached please find comments from the San Mateo County Resource
Conservation District on the valuable role of RCDs across the state
in reducing GHGs.
```

Attachment: www.arb.ca.gov/lists/com-attach/115-2013investmentpln-ws-BmoHXlY2UHELbwJd.doc

Original File Name: l_ARB Recommendations 3 7 13.doc

Date and Time Comment Was Submitted: 2013-03-07 12:30:25

No Duplicates.

Comment 96 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Sandi
Last Name: Galvez
Email Address: sgalvez@phi.org
Affiliation: Bay Area Regional Health Inequities Init

Subject: Look for health and equity co-benefit opportunities
Comment:

```
Please see our attached letter
```

Attachment: www.arb.ca.gov/lists/com-attach/116-2013investmentpln-ws-UDIHYFAjV2wEa1M6.pdf

Original File Name: BARHII CT comments 030613.pdf

Date and Time Comment Was Submitted: 2013-03-07 12:56:37

No Duplicates.

Comment 97 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dominic
Last Name: Meo
Email Address: dommeo@verizon.net
Affiliation: Meo & Associates

Subject: Investing Funds from Cap and Trade Auction
Comment:

See attachment

Attachment: www.arb.ca.gov/lists/com-attach/117-2013investmentpln-ws-AmEGYVQnVGUCKQJu.pdf

Original File Name: CARB-letter-Meo 03-05-13.pdf

Date and Time Comment Was Submitted: 2013-03-07 13:04:38

No Duplicates.

Comment 98 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jayne
Last Name: Joy
Email Address: ombcomm@arb.ca.gov
Affiliation: Eastern Municipal Water District

Subject: Investment Plan for Auction Proceeds
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/118-2013investmentpln-ws-BmUAZ1wvADEBWARn.pdf

Original File Name: carb_comments_investmentplan.pdf

Date and Time Comment Was Submitted: 2013-03-07 13:18:42

No Duplicates.

Comment 99 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Richard
Last Name: Cameron
Email Address: allyson.teramoto@polb.com
Affiliation: Port of Long Beach

Subject: Cap-and Trade Auction Proceeds Investment Plan - Draft Concept Paper
Comment:

```
Please see attachment.
```

Attachment: www.arb.ca.gov/lists/com-attach/119-2013investmentpln-ws-BzUCNFVlVDRXYVRn.pdf

Original File Name: 20130308_CA Resource Board_Cap-and-Trade ResoucresInvestment Plan_draft concept_AT.pdf

Date and Time Comment Was Submitted: 2013-03-07 13:36:47

No Duplicates.

Comment 100 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

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

Subject: comments
Comment:

```
the attached document is based on my general comments last year,
and offers 2 ideas for investment.
```

Attachment: www.arb.ca.gov/lists/com-attach/120-2013investmentpln-ws-WjlRNlUkV1sDcQJw.docx

Original File Name: cap&trade comments march 2013.docx

Date and Time Comment Was Submitted: 2013-03-07 13:58:54

No Duplicates.

Comment 101 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Nicole
Last Name: Smith
Email Address: nsmith@coastalrcd.org
Affiliation: Coastal San Luis RCD

Subject: AB 32
Comment:

```
We support the California Association of Resource Conservation
Districts' recommendations of existing programs and implementing
bodies for the revenues generated by AB 32. See the attachment for
our full comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/121-2013investmentpln-ws-UDMHblY6VGpRMgNt.pdf

Original File Name: Comment Letter on AB32Revenues_CSLRCD.pdf

Date and Time Comment Was Submitted: 2013-03-07 13:57:28

No Duplicates.

Comment 102 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Samir
Last Name: Sheikh
Email Address: samir.sheikh@valleyair.org
Affiliation: San Joaquin Valley APCD

Subject: Comments re: Concept Paper for 2013 Investment Plan for Cap & Trade Auction Proceeds
Comment:

```
Comment letter attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/122-2013investmentpln-ws-VzRSNV0sU19RNlA+.pdf

Original File Name: Cap and Trade Fund Comments to ARB 3.7.13.pdf

Date and Time Comment Was Submitted: 2013-03-07 14:08:38

No Duplicates.

Comment 103 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michael
Last Name: Sigala
Email Address: michael@sigalainc.com
Affiliation: San Joaquin Valley MPOs

Subject: Cap and Trade Investment Plan Comments
Comment:

```
Please see our comment letter attached.
Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/123-2013investmentpln-ws-BnUGagB3VVlRJVAg.pdf

Original File Name: SJV RPA Cap and Trade Investment Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-03-07 14:21:47

No Duplicates.

Comment 104 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Vicky
Last Name: Dawley
Email Address: vicky@tehamacountyrcd.org
Affiliation: Tehama County RCD

Subject: Cap-and-Trade Investment Recommendations
Comment:

```
Please accept the attached letter as the recommendations of the
Tehama County RCD for investing revenue from the cap-and-trade
program.
```

Attachment: www.arb.ca.gov/lists/com-attach/124-2013investmentpln-ws-UDwBYlInBCMDYANx.pdf

Original File Name: letter AB 32 Investments 3_13.pdf

Date and Time Comment Was Submitted: 2013-03-07 14:32:54

No Duplicates.

Comment 105 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Brent
Last Name: Constantz
Email Address: brentc@stanford.edu
Affiliation: Blue Planet Ltd.

Subject: Carbon Capture and Reutilization
Comment:

In order to decarbonize electricity, reducing carbon intensity of electrical power generation will not allow the goals to be met. Carbon capture from flue gases will be required to meet the current total emission reduction goals. Geological storage and monitoring of purified carbon dioxide from flue gases has proven infeasible and to have limited geographic applications. Carbon capture and re-ulilization for applications in the built environment such as carbonate cements and aggregates, especially for roadways, promises to be the most available method of large scale carbon dioxide capture, and is both economically and technically sustainable. Collaboration between CARB and CalTrans could forge a link between emission reduction goals and re-utilization of carbon dioxide from emitters for carbonate cement and aggregate products for use in road construction projects.

Attachment: www.arb.ca.gov/lists/com-attach/125-2013investmentpln-ws-VTcFbwZyBzFWDwBw.docx

Original File Name: BLUE PLANET.docx

Date and Time Comment Was Submitted: 2013-03-07 14:25:40

No Duplicates.

Comment 106 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Marvin
Last Name: Mears
Email Address: marvin@eptcorp.com
Affiliation:

Subject: Use of Proceeds from Auction Revenue
Comment:

As a Stakeholder, we are submitting this document as a public comment to the Cap-and-Trade Workshops, specifically to address ARB use of proceeds.

We believe, and strongly suggest, that the ARB can provide its greatest public benefit through a focus on incentive programs that promote the development of renewable natural gas through the anaerobic digestion of dairy manure.

Such a program would have a profound effect on California's four most challenged counties. Tulare, Kings, Madera and Merced counties are at the bottom ranking of most social and economic profiles, yet they are also the home to the majority of dairy farms in the state, 789 to be exact. Further, these counties have 171 food processing and manufacturing facilities that could greatly contribute to the amount of feed stock used for CNG fuel production.

This concept is the logical answer to providing the maximum economic and environmental benefits to the State of California. It solves many problems for dairy farmers, from production to compliance issues. It provides substantial employment opportunities through the construction of facilities, creating permanent and ancillary jobs in areas of the state that need it most. It also provides the ARB the opportunity to accomplish its goals in such a sweeping manner, it would be quantifiably challenging to compete against with any other program.

Please circulate and consider the more detailed comments attached

Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/126-2013investmentpln-ws-WzhSNQZ3V1sLbFQ6.pdf

Original File Name: Cap and Trade ResponseEP&T.pdf

Date and Time Comment Was Submitted: 2013-03-07 15:01:16

No Duplicates.

Comment 107 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ed
Last Name: King
Email Address: ed.king@smgov.net
Affiliation:

Subject: Support for Transp Coalition in Cap & Trade Invest Plan
Comment:

```
Letter attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/127-2013investmentpln-ws-Am9TNAR3UXtXDlA+.pdf

Original File Name: Mary Nichols CTA Support Letter.pdf

Date and Time Comment Was Submitted: 2013-03-07 15:21:01

No Duplicates.

Comment 108 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Stephen
Last Name: Del Guercio
Email Address: awilson@lcf.ca.gov
Affiliation: City of La Canada Flintridge

Subject: Cap-and-Trade Auction Proceeds
Comment:

```
The City of La Canada Flintridge supports investments from
Cap-and-Trade auction proceeds in light rail, bus rapid transit,
active transportation and other non-highway projects per our
attached letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/128-2013investmentpln-ws-B2tTMFYjVXIBYgBy.pdf

Original File Name: Letter to ARB 3-7-13.pdf

Date and Time Comment Was Submitted: 2013-03-07 15:29:03

No Duplicates.

Comment 109 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Susan
Last Name: Freedman
Email Address: susan.freedman@sandag.org
Affiliation: San Diego Association of Governments

Subject: SANDAG Comments on the Investment Plan Draft Concept Paper
Comment:

```
Attached please find comments from the San Diego Association of
Governments (SANDAG) on the Cap-and-Trade Auction Proceeds
Investment Plan Draft Concept Paper. Thank you for this opportunity
to weigh in on the development of the investment plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/129-2013investmentpln-ws-USJSNQFuBTIDZFUy.pdf

Original File Name: SANDAG_Cap-and-Trade_Comments_030713.pdf

Date and Time Comment Was Submitted: 2013-03-07 15:30:00

No Duplicates.

Comment 110 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: James
Last Name: Stone
Email Address: jstone@walksandiego.org
Affiliation:

Subject: Cap and Trade Revenues for Transportation
Comment:

Ms. Nichols,

WalkSanDiego is one of more than 50 organizations that have signed on to the Sustainable Communities for All Proposal. We believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

Cap and Trade funds should help California maximize co-benefits of improved public health, social equity, green jobs and protection of habitat and agricultural land. As such, we ask that a significant portion of future cap and trade revenues go to core transit projects and transit operations to quickly expand service and increase ridership and active transportation infrastructure to increase walking and biking trips. Funding active transportation will help facilitate further reductions in carbon emissions and create additional health and economic benefits. More than half of the San Diego regional population spends 30% of their income on transportation, whereas state and U.S. averages are around 40%. Biking and walking account for 14% of all trips in the San Diego region, yet receive just over 3% of regional funds – and statewide receive only one percent of all transportation funding.

One percent of funding is inadequate to significantly improve streets and encourage more active transportation. As a result, we request that a minimum of 15% of cap and trade revenue be dedicated to active transportation projects and programs. Many residents in San Diego comment they would be more likely to ride or walk if they felt safer. Recent data show that increased investments in biking and walking infrastructure can decrease GHGs 14%. (Maizlish et al, Health Co-benefits and Transportation Related Reductions in Greenhouse Gas Emissions in the San Francisco Bay Area, 2013).

Please also ensure that a portion of funding be dedicated to education. Based on the success of the Safe Routes to School program which combines infrastructure and education, this combined effort is necessary to change travel behavior. Through WalkSanDiego educational programs, we have seen increases of up to 125% and an average of 50% of families walking to school after targeted outreach conducted through Safe Routes to School programs.

Other recommendations include:
• For funding criteria, please ensure that projects are consistent with the Sustainable Communities Strategy.

• Require all transportation projects that receive cap and trade revenues to address Complete Streets requirements outlined in AB 1358, California’s Complete Streets Act.
• Use funds to implement transportation demand management strategies and incentives that reduce both vehicle travel and ownership.

Thank you for the opportunity to comment,

James D. Stone,

Executive Director

Attachment: www.arb.ca.gov/lists/com-attach/130-2013investmentpln-ws-VTZSNQZ1BzYBWABj.doc

Original File Name: CARB Cap and Trade Revenues Comments WalkSanDieog.doc

Date and Time Comment Was Submitted: 2013-03-07 15:29:00

No Duplicates.

Comment 111 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Brian
Last Name: Shafritz
Email Address: ShafritzB@sbcapcd.org
Affiliation: Santa Barbara County APCD

Subject: Invest in Ship Speed Reduction to Reduce GHG along California Coast
Comment:

California's clean-transportation goals and sustainable freight strategy can be advanced by implementing a voluntary vessel speed reduction (VSR) incentive program along the California coast to cut emissions from transiting ships.

This VSR initiative would expand the existing successful vessel speed reduction incentive programs at the Ports of Los Angeles and Long Beach. The initiative would produce significant GHG reductions and numerous co-benefits.

See attachment for complete information.

Attachment: www.arb.ca.gov/lists/com-attach/131-2013investmentpln-ws-UCNdOQFjBTcKfAlq.pdf

Original File Name: SBCAPCD-toCARB-030713.pdf

Date and Time Comment Was Submitted: 2013-03-07 15:17:06

No Duplicates.

Comment 112 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Janet
Last Name: Olave
Email Address: janet.olave@mcrcd.org
Affiliation: Mendocino County RCD

Subject: AB32 Revenue Recommndations
Comment:

```
Please see attached letter.  Thank you.  Janet Olave
```

Attachment: www.arb.ca.gov/lists/com-attach/132-2013investmentpln-ws-AWBcOFxuWDlQCVQm.pdf

Original File Name: AB32 Revenue Recommendations.pdf

Date and Time Comment Was Submitted: 2013-03-07 15:54:46

No Duplicates.

Comment 113 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Anthony
Last Name: Andreoni
Email Address: tandreoni@cmua.org
Affiliation: CMUA

Subject: Comment Letter Attached
Comment:

```
Please see CMUA's attached comment letter on the Investment Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/133-2013investmentpln-ws-UjEAa1AkBTdRCABj.pdf

Original File Name: CMUA_Comment Letter_3_7_2013_Final.pdf

Date and Time Comment Was Submitted: 2013-03-07 16:17:54

No Duplicates.

Comment 114 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeffrey
Last Name: Webster
Email Address: jwebster_ruraltransit@fresnocog.org
Affiliation: Fresno County Rural Transit Agency

Subject: Comments on Draft Cap & Trade Transportation Plan
Comment:

```
Attached is our Comment Letter regarding Support for the
Transportation Coalition's proposal in the "Draft Concept Paper on
the Cap & Trade Auction Proceeds Investment Plan"
```

Attachment: www.arb.ca.gov/lists/com-attach/134-2013investmentpln-ws-UzUBZANwWX5VMlQL.pdf

Original File Name: FCRTA cap&tradeLtr.pdf

Date and Time Comment Was Submitted: 2013-03-07 16:22:03

No Duplicates.

Comment 115 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Carol
Last Name: Kramer
Email Address: khan94874@mypacks.net
Affiliation:

Subject: Re:state's new Cap and Trade program
Comment:

CARB needs to utilize a scientific review process for controversial projects, and to set up a process for distributing funds once they are sent to the state agencies. These are suggestions I agree with:

• An independent panel of scientists shall be utilized to review projects, especially contentious ones, to ensure they will in fact significantly reduce GHG emissions. The members of this review panel shall be selected by CARB and the cities directly affected by such projects, and these selections need to be based on their expertise in the field.

• Auction proceeds shall not be used for new roadway/widening projects. Dollars should be focused on improving public transportation, encouraging active transportation, and repairing existing roadways and bridges.

• The public should have an opportunity to weigh in on the method for distributing funding from the state agency level, once allocation levels are determined.
also

• Set aside monies for active transportation and public transportation projects, which will make walking, bicycling and using public transit a more viable option for City residents.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 16:20:37

No Duplicates.

Comment 116 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Brittany
Last Name: Heck
Email Address: Brittany@goldridgercd.org
Affiliation: Gold Ridge Resource Conservation Distric

Subject: Resource Conservation Districts and AB 32
Comment:

March 8, 2013

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

Dear Chairman Nichols,

We know that you are familiar with the great work RCDs are doing throughout the State. On behalf of the Gold Ridge Resource Conservation District and the 99 Resource Conservation Districts in the State of California, we find it imperative that investments of AB 32 revenues be made in farmland preservation, watershed protection, and natural resource conservation. We make specific recommendations below of programs that can benefit job creation, greenhouse gas reduction, avoidance of future greenhouse gas creation, and will provide multiple other benefits including habitat, clean water, strong rural communities, and resilient food systems. While transportation reduction is an important goal, augmenting that spending with the programs enumerated in this letter will bring a greater net benefit to the State of California by providing both direct greenhouse gas reduction and secondary benefits for a cleaner, stronger, more livable California.

In addition, we recommend that Resource Conservation Districts are the correct implementing body for many of these programs. As the local hub of State-level conservation programs and local communities, RCDs provide a critical link in connecting landowners and local actors to the overarching goals identified in AB 32. We have the resources, expertise, statutory authority under Division 9 of the Public Resources Code and connection with the landowner that is necessary to create meaningful, quantifiable, accountable and lasting change. This type of buy-in is essential to creating a long term response to California’s pressing GHG reduction needs.

1) Conserve working lands including farmland, forests, and range. Conserving lands from urban development reduces the total vehicle miles traveled, creates lands that serve as sinks for carbon in plant and soils, and creates strong rural economies that serve as the backbone for California’s economy.
Programs to invest in include:
California Farmland Conservation Program housed in the Department of Conservation
Williamson Act Subvention Funds

Farmland Mapping and Monitoring Program housed in the Department of Conservation
Resource Conservation Districts for on-the-ground conservation projects

2) Conserve wildlands, parks and natural areas
Conserving properly managed wildlands creates carbon sinks in plants and soils while providing for the natural heritage that makes California unique.

Programs to invest in include:
The Wildlife Conservation Board
Department of Fish and Wildlife easement programs
Resource Conservation Districts for on-the-ground conservation projects

3) Provide stewardship of California's watersheds
Watershed protection is vital to creating a resilient, healthy water supply, preserving carbon sinks in protecting wetland corridors and other natural features, building wide spread support and networks for GHG reduction, reducing agricultural and residential water use and thus energy use, avoiding soil loss (thus creating carbon sinks), providing habitat for California's wildlife and building the natural and rural character of California.
Programs to invest in include:
We make a strong recommendation to support the Statewide Watershed Program and the Resource Conservation District Assistance Program both housed in the Department of Conservation. The programs support natural resource conservation projects implemented in coordination with landowners within targeted watersheds in the state. The Statewide Watershed Program funds watershed coordinators and on-the-ground, conservation projects that provide tangible and significant natural resource conservation benefits. The Resource Conservation District Assistance Program offers technical and financial assistance to Resource Conservation Districts to support their land stewardship work with local landowners. Both programs can be scaled up to target projects statewide to reduce GHG emissions and sequester carbon.

Other programs that support landowner assistance in ways that would help reduce GHG emissions:
Fertilizer Research Enhancement Program in the Department of Food and Agriculture

AB 32 marks a significant change in California's response to the collective challenges we face. It is essential that we answer those challenges in a thoughtful, holistic, well-rounded way in order to guide the future of our State. An emphasis on multiple benefits, thoughtful consideration of total impact, and a commitment to strong rural economies and the preservation of California's unique natural resources will serve as strong guiding principles for the future of California.

Thank You,

Brittany Heck
Executive Director

Attachment: www.arb.ca.gov/lists/com-attach/136-2013investmentpln-ws-AGdWP1M+WW4BWAFz.pdf

Original File Name: Gold Ridge RCD AB 32.pdf

Date and Time Comment Was Submitted: 2013-03-07 16:49:02

No Duplicates.

Comment 117 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Thomas
Last Name: Ayres
Email Address: tjayres@sbcglobal.net
Affiliation: East Bay Bicycle Coalition

Subject: Support for Cap-and-Trade Proposal
Comment:

```
Mary Nichols
Chair, California Air Resources Board

Dear Ms. Nichols:
     I am a safety researcher and a member of the Board of the East
Bay Bicycle Coalition.
     I strongly support the proposal for Sustainable Communities
for All (SB 375). We need to provide transportation and housing
choices that encourage people to drive less - for health, equity,
and the environment.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 16:51:09

No Duplicates.

Comment 118 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Patrick
Last Name: Leathers
Email Address: patrick@ctechadvocates.com
Affiliation:

Subject: Cap and Trade auction proceeds investment plan
Comment:

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Submitted on behalf of Clean Tech Advocates.
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Attachment: www.arb.ca.gov/lists/com-attach/139-2013investmentpln-ws-WjlRO1YyBDZQOFIN.zip

Original File Name: Clean Tech Advocates CARB submission-investement plan.zip

Date and Time Comment Was Submitted: 2013-03-07 16:57:24

No Duplicates.

Comment 119 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Coby
Last Name: Skye
Email Address: cskye@dpw.lacounty.gov
Affiliation: LA County Department of Public Works

Subject: Cap and Trade Auction Proceeds Investment Plan Comments
Comment:

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Attached please find comments on the Cap and Trade Auction Proceeds
Investment Plan from Los Angeles County Department of Public Works.
```

Attachment: www.arb.ca.gov/lists/com-attach/140-2013investmentpln-ws-WjlQN1EgBHpWMVc5.pdf

Original File Name: Cap-and-Trade Investment Plan Comments.pdf

Date and Time Comment Was Submitted: 2013-03-07 16:38:12

No Duplicates.

Comment 120 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Chelsea
Last Name: Hodge
Email Address: chelsea@tenaya.com
Affiliation:

Subject: Investment plan for cap-and-trade auction revenues
Comment:

March 7, 2013

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

RE: Investment plan for cap-and-trade auction revenues

Dear Chair Nichols:

As a daily transit rider and cyclist (who uses these as my only sources of transportation; I do not own or have access to a car on a regular basis) I would like to express my strong support for the Sustainable Communities for All Proposal. I believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

I believe it is critical to build both homes and transit that are affordable and accessible to lower-income households, while supporting active transportation to improve health. Just this week, the Census Bureau named the San Francisco area the nation's "megacommuter" capitol – people who travel at least 50 miles and 90 minutes to work – with San Jose close behind. When people are priced out of homes near job centers and high-quality transit hubs, they must drive long distances to work.

According to a recent report by the California Housing Partnership Corporation, preserving and building affordable homes near transit will allow California to achieve the maximum VMT and GHG-reduction benefits of investment in transit infrastructure and transit-oriented development.

Sprawl and congestion are also bad for health - each additional hour spent in a car per day is associated with a 6 percent increase in the likelihood of obesity. Investing in safe bicycle and pedestrian infrastructure and programs like Safe Routes to School improves health in both urban and rural areas, and especially in minority communities where pedestrians are significantly more likely to be killed by vehicles.

Investments like these will have the greatest impact on the communities most affected by climate change while also increasing

access to opportunities.

Thank you for considering my comments,

Sincerely,

Chelsea Hodge
San Francisco resident
Client Consultant at Lucid Design Group (Oakland, CA)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 17:10:36

No Duplicates.

Comment 121 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Albert
Last Name: Lerma
Email Address: albert.lerma@sonoma-county.org
Affiliation: Sonoma County Economic Development Board

Subject: Sonoma County Green Business Program
Comment:

The Sonoma County Green Business Program is a partnership of government agencies and utilities that assists, recognizes, and promotes local organizations, focusing on small- to medium-sized consumer-oriented businesses that volunteer to operate in a more environmentally responsible way. To be certified, participants must be in compliance with all environmental regulations and meet program standards for conserving resources, preventing pollution, and minimizing waste.

We are part of the Bay Area Network of Green Business Programs supported by the Association of Bay Area Governments and a part of the California Green Business Network. We welcome funding support from the investment plan from the auction proceeds to the state from the CAP-and-Trade Program to reduce green house gases.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 16:53:43

No Duplicates.

Comment 122 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Adriane
Last Name: Garayalde
Email Address: garayalde@snowcrest.net
Affiliation: Shasta Valley RCD

Subject: ARB Recommendations
Comment:

See attached letter.

Attachment: www.arb.ca.gov/lists/com-attach/143-2013investmentpln-ws-BmdUIFMwWVVWIlA1.doc

Original File Name: ARB Recommendations letter 3 7 13.doc

Date and Time Comment Was Submitted: 2013-03-07 17:12:58

No Duplicates.

Comment 123 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: John
Last Name: Diener
Email Address: redrock_ranch@yahoo.com
Affiliation: Red Rock Ranch President

Subject: Cap-and-Trade Program revenue allocation and investment
Comment:

March 7, 2013

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Cap-and-Trade Program revenue allocation and investment

Dear Air Resources Board Chairman Mary Nichols,

We write you in support of Cap-and-Trade revenue investment in sustainable agricultural practices, specifically the innovative and truly unique research and outreach being conducted by the UC Sustainable Agriculture Research and Education Program (UC SAREP).

UC SAREP and its partner program, the Russell Ranch Sustainable Agriculture Facility at UC Davis, work to find and share solutions that address climate change mitigation and adaptation, enhance practices for natural resource stewardship, and reduce farmers' production costs.

Agriculture is uniquely vulnerable to climate change. It can also be a powerful tool to fight climate change and reduce GHG emissions through on-farm conservation methods. Many of the practices modeled by sustainable and organic farmers offer some of the best strategies for reducing agriculture's carbon footprint, mitigating climate change and helping farmers adapt. Techniques such as the use of cover crops and manure, management of nutrient inputs and irrigation for optimal efficiency, conservation tillage, planting perennial buffers and management of the timing and density of livestock grazing can increase soil organic matter and sequester more soil carbon on farm and rangeland, thereby capturing atmospheric carbon and lowering GHG concentrations. Widespread adoption of these methods could make a significant impact on California's climate challenge.

Multiple co-benefits can accompany these and other climate-protecting agricultural practices. For example, properly managed livestock grazing has the potential to increase soil carbon sequestration while also increasing water retention, reducing soil erosion, increasing forage quality and enhancing wildlife habitat and native grass populations. Furthermore, practices that reduce agriculture's GHG emissions can also help the industry adapt to the coming changes in weather and water availability induced by climate

change. Farms, ranches and food processors can achieve greater water conservation and energy efficiency and unleash the potential for generating renewable energy.

Over the past 27 years, UC SAREP has helped to launch several initiatives, programs and studies that have provided, and are still providing, solutions–such as those mentioned above—to California's agricultural and environmental challenges. As the California Air Resources Board considers where to invest the Cap-and-Trade revenue, we recommend that the investment plan include funding for UC SAREP, which is the only statewide sustainable agriculture program with a mandate from the California Legislature.

UC SAREP's well-established small grants program is now unfunded, but could be reactivated to stimulate innovation in California agriculture to address climate change and the closely-related topics of energy efficiency, water-use efficiency and nutrient management.

By investing in UC SAREP, California would be supporting technical assistance and collaborative action on:
• sequestering carbon in soils, orchards and rangelands
• farm practices that minimize GHG emissions
• replacing fertilizer-intensive urban landscapes (lawns) with carbon sequestering food gardens and urban agricultural parks, while increasing the food security of disadvantaged communities
• long-term, large-scale research asking big questions about climate/energy, water, and soil health that – 18 years into a 100-year study – is already generating data and advancing knowledge to support practical steps for climate change mitigation and adaptation in California agriculture
• sharing important information through the UC SAREP Solution Center, an online and in-person platform to share solutions with the agricultural community to big challenges. SAREP's first Solution Center focuses on climate change, water management and nutrient efficiency.

There are many proposed initiatives across the state that could be scaled up. UC SAREP and its partner program, the Russell Ranch Sustainable Agriculture Facility, bring organizations and people together to develop collaborative solutions to the challenges we face today and to achieve broader adoption and impact. This is why we call for your on-going commitment to support UC SAREP, a research program with a strong focus on reducing agricultural GHG emissions in order to assure the profitability, viability and resilience of California agriculture in the face of climate change.

Sincerely,

John Diener, President, Red Rock Ranch, Five Points, CA

and

AG Kawamura, Founding Member, Orange County Produce, Irvine, CA and former Secretary, California Department of Food and Agriculture, Sacramento, CA

Joined by:

Marcus Benedetti, President and CEO, Clover Stornetta Farms, Petaluma, CA

Ashley Boren, Executive Director, Sustainable Conservation, San Francisco, CA
Michael Dimock, Executive Director, Roots of Change, San Francisco, CA
Cornelius Gallagher, Senior Vice President, Food, Agriculture and Wine Executive, Bank of America, Roseville, CA
Carl Johnson, Executive Vice President, Brands, Del Monte Foods, San Francisco, CA
Craig McNamara, President, California State Board of Food and Agriculture, Sacramento, CA; President, Sierra Orchards; Co-Founder, Center for Land Based Learning, Winters, CA
Haider Nazar, Chief Executive Officer, Verliant Energy Partners, Walnut Creek, CA
Judith Redmond, Owner and Partner, Full Belly Farm, Guinda, CA; Community Alliance for Family Farmers Board Secretary
Richard Rominger, Rominger Farms, Winters, CA; former US Department of Agriculture Deputy Secretary; former California Department of Food and Agriculture Secretary
Howard-Yana Shapiro, Ph.D., Chief Agricultural Officer, Mars, Incorporated; Senior Fellow, Plant Sciences, College of Agriculture, UC Davis; Distinguished Fellow, The World Agroforestry Centre; and Co-founder, Seeds of Change

Cc:
Karen Ross, Secretary, California Department of Food and Agriculture, Sacramento, CA
Martha Guzman Aceves, Deputy Legislative Affairs Secretary, Office of Governor Edmund G. Brown, Jr., Sacramento, CA
Barbara Allen-Diaz, Vice President, Agriculture and Natural Resources, University of California, Oakland, CA
Mary Delany, Interim Dean, College of Agricultural & Environmental Sciences, University of California, Davis
David Wehner, Dean of the College of Agriculture, Food and Environmental Sciences at California Polytechnic State University, San Luis Obispo, CA
Rachel Surls, Sustainable Food Systems Advisor, UC Cooperative Extension, Los Angeles, CA
Thomas Turini, Vegetable Crops Farm Advisor, UCCE Fresno County, Fresno, CA
Katharina Ullmann, UC Davis Dept. of Entomology
Kase Wheatley, student, UC Davis Sustainable Agriculture and Food Systems major

Attachment: www.arb.ca.gov/lists/com-attach/144-2013investmentpln-ws-Uj5dPgN2UXYCYQR2.docx

Original File Name: Letter to CARB reg UC SAREP.docx

Date and Time Comment Was Submitted: 2013-03-07 16:23:35

No Duplicates.

Comment 124 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Judy
Last Name: Bergstresser
Email Address: bergstressers@sbcglobal.net
Affiliation: The GRID project

Subject: CAT auction proceeds to GRID zero-emission port and goods movement system
Comment:

The GRID project is an environmentally-superior project to modernize port operations and goods movement at the San Pedro port complex and region-wide. It meets every published criteria for the inclusion and highest priority in the investment plan for auction proceeds from the cap-and-trade program to reduce greenhouse gases (GHGs).

It provides an ideal alternative to planned port and freeway expansion projects that are opposed by local communities, subject to CEQA challenges and legally contested.

• The GRID project is a zero-emissions project from shipside crane to inland empire distribution facilities.
• The GRID project provides on-dock, zero-emission rail transport for goods movement.
• The GRID project prevents the need for the expansion of port operations to off-dock and near-dock facilities.
• The GRID project provides investment opportunities in and for the identified disadvantaged communities in the port and I-710 adjacent areas.
• The GRID project creates jobs and job training programs in and for these disadvantaged communities.
• The GRID project creates a new infrastructure in support of the electrification of Class 1 railroads.
• The GRID project creates a hub-and-spoke system around existing inland intermodal distribution facilities in support of freight truck electrification.

Attachment: www.arb.ca.gov/lists/com-attach/145-2013investmentpln-ws-VDcAZ1wpAw8BZgZy.docx

Original File Name: CAT_Attachment_public_comment_2013-03-08.docx

Date and Time Comment Was Submitted: 2013-03-07 16:44:55

No Duplicates.

Comment 125 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Rick
Last Name: Bettis
Email Address: rckbettis40@gmail.com
Affiliation: Breathe Ca., LWvoters, Sierra club

Subject: Cap and Trade investment Plan
Comment:

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I believe that the funding allocation should be adjusted to give
more funding to the electric vehicle deployment and electric
charging station infrastructure.

I believe that it is clear that the effects of climate change are
clearly being demonstrated by such examples as the loss of arctic
ice and the effect on ocean corral due to acidification. The
dangers to public health, safety economy and the environment are
increasingly critical.

It is recognized that natural gas and biofuels will provide  a
"bridge to time when we can convert to non-emitting sources of
energy I believe that we must accelerate our efforts towards
conversion to electric energy generated by such sources as solar
and wind.

Given the increase in consumer costs due to the cap and trade
program we should also consider more funding for needs of the
disadvantaged, including energy cost subsidies as well as job
training.

Thank you for your consideration.

Sincerely
Rick Bettis
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 16:28:54

No Duplicates.

Comment 126 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Laura
Last Name: Cohen
Email Address: laura@railstotrails.org
Affiliation: Rails-to-Trails Conservancy

Subject: Invest in Active Transportation
Comment:

Rails-to-Trails Conservancy is a national non-profit working to create healthy places for healthy people by creating networks of trails and active transportation systems.

We have joined more than 50 organizations in signing on to the Sustainable Communities for All Proposal. We believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

Investing in “Active Transportation” – bicycling and walking – should be an important part of California’s strategy in implementing our climate change programs. A significant portion of trips in California being short trips - the California Household Transportation Survey found that 49% of all trips taken in the state were less than 15 minutes in length, and 30% were less than 10 minutes in length. This presents a great opportunity to convert these trips to biking and walking by creating better, safer infrastructure. Substituting biking, walking or transit for car trips, a single person prevents 4,800 pounds of CO2 from entering the atmosphere each year.

Low-income and disadvantaged communities have higher rates of biking and walking and also higher rates of fatalities and injuries; One third of our total trips are walking or on a bike, yet only about two percent (2 percent) of our transportation funds are spent on bike and pedestrian infrastructure, and recently, federal spending on active transportation was cut by 30%.

The Administration has proposed creation of a new Active Transportation Program at the state level to help communities achieve their SB 375 goals by investing in bicycle, pedestrian and related infrastructure. Adding cap-and-trade auction revenue to this program will help accelerate our achievement of those goals.

Investment in Active Transportation and the other components of the Sustainable Communities for All Proposal will have the greatest impact on the communities most affected by climate change while also increasing access to opportunities and improving public health.

Thank you for considering our comments,
Sincerely,
Laura R. Cohen

Director, Western Region
Rails-to-Trails Conservancy

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 17:18:44

No Duplicates.

Comment 127 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Bruce
Last Name: Springsteen
Email Address: bsprings@placer.ca.gov
Affiliation: Placer County Air Pollution Control Dist

Subject: Suggestion on investment of Cap and Trade Auction Revenue
Comment:

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See comments attached.
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Attachment: www.arb.ca.gov/lists/com-attach/148-2013investmentpln-ws-BXUCZ1w8WHtXMlI2.pdf

Original File Name: pcapcd_cap_trad_auct_revenue_suggest.pdf

Date and Time Comment Was Submitted: 2013-03-07 17:03:48

No Duplicates.

Comment 128 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Eric
Last Name: Johnson
Email Address: ericsj@mindspring.com
Affiliation: Sierra Club

Subject: Comment letter for ARB Draft Investment Plan
Comment:

See attached comment letter.

Attachment: www.arb.ca.gov/lists/com-attach/149-2013investmentpln-ws-AHBTNlM6BCMDYwJd.pdf

Original File Name: PCHTF ARB Investment Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-03-07 17:33:29

No Duplicates.

Comment 129 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ann
Last Name: DuBay
Email Address: ann.dubay@scwa.ca.gov
Affiliation: Sonoma County Water Agency

Subject: Cap and Trade Investment Plan Comment
Comment:

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Please see the attached letter regarding local governments proposal
for CARB auction revenue investment plan. Thank you!
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Attachment: www.arb.ca.gov/lists/com-attach/150-2013investmentpln-ws-AnFQOQZpBTkGbQlo.pdf

Original File Name: Sonoma County Water Agency Letter CARB 3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-07 17:34:33

No Duplicates.

Comment 130 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Karen
Last Name: Merchant-Yates
Email Address: elpho@sbcglobal.net
Affiliation:

Subject: The Use of CARB monies
Comment:

We would really like to sustain and grow the communities we have been building in these hard times with gasoline-free transportation. The closest we can get would be a rail alternative. And it should be affordable.

The extension to the 710 freeway does not show foresight - it is a quick and dirty solution in my opinion, because it continues the use of roads and trucks and gas while carving up communities.

To consider freeway extension should require independent scientific studies, and impartial decision makers (*perhaps the UC Regents)and adjustments should be made to include their input so that GHG emissions would be substantially reduced and people could have reasonable and affordable access to travel without cars. Bike lines, rail - these infrastructures take time to build but would help us escape gasoline dependence.

Monies should be used for maintenance of what we have, not building more that will then cost to be maintained - stop building our way out of the problem and face it head on.

The public should be given an opportunity to give feedback and the public perspectives should be included in the decision making process. The state agencies and boards involved with mass transit at the local level have not been very open to input.

Thanks very much,

Sincerely

Karen Merchant Yates and Nick Yates

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 18:15:34

No Duplicates.

Comment 131 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Josephine
Last Name: Fleming
Email Address: jo.fleming@envirocentives.com
Affiliation: California Green Business Program

Subject: Cap and Trade Proceeds to Benefit Small Businesses
Comment:

The California Green Business Program: Government and Small Businesses Working Together to Create a Green Economy

The California Air Resources Board has done a wonderful job reaching out to stakeholders and the public to listen to all ideas and concepts regarding Cap and Trade Proceeds. I very much appreciate this opportunity to voice an idea that is shared by 21 local jurisdictions and over 2700 small to medium sized businesses in California.

Small businesses collectively play a large role in California. They are the largest employer and they have demonstrated a strong interest in both environmental and community improvement. Although small businesses are vital to the California economy, more often than not they are hit by government fees, inspections, and strict permit and licensing requirements that are more appropriately scaled toward larger businesses. One of the few programs that positively links government and the small business community is the Green Business Program.

The Green Business Program incentivizes businesses to improve environmental performance, while also fostering environmental awareness amongst their employees and community. Government run Green Business Programs provide technical assistance and rebates, as well as promotion to these Green Businesses. From Alan Rice Automotive in Soquel, "We chose to participate in the Green Business Program because we believe playing an active role in preserving the environment is an important aspect to conducting business. We have always paid close attention to minimizing the impact my business leaves and are now better able to communicate that to our customers." From Bay Building Janitorial,"We conduct our business with respect and care for our environment and implement strategies that achieve the greatest benefit for everyone. The Green Business Program has proven to be a valued partner in achieving these goals." From Charlie Hong Kong Restaurant in Santa Cruz, ""Our intention is to operate our business in a sustainable manner. We follow the core values: to conserve, protect, and respect the environment natural and human. We are committed to serving organic food, buying locally grown produce and using local venders as much as possible. We appreciate the recognition and collaboration of other businesses. Thank you to the County and City of Santa Cruz for taking on this important project."

The Green Business Program measures their success through a central

web-based database system. Approximately 2700 businesses throughout the state have so far reduced greenhouse gas emissions by 171,677 tons and saved 38,254,747 kWhrs, among many other metrics. However, the database and the statewide function of the Green Business Program was formerly supported by the State Department of Toxic Substances Control, which is no longer capable of supporting the program. Funding is needed to both maintain the central reporting feature and to continue to foster new Green Business Program to blossom throughout the state.

Please consider a mechanism to utilize Cap and Trade proceeds to fund the California Green Business Program. Direct reporting of GHG emissions reductions will result, and it will bolster our small businesses and the communities in which they operate. Thanks very much for your consideration.

Attachment: www.arb.ca.gov/lists/com-attach/152-2013investmentpln-ws-VSFdMwZiVlpWMwZn.docx

Original File Name: The California Green Business Program.docx

Date and Time Comment Was Submitted: 2013-03-07 18:56:38

No Duplicates.

Comment 132 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Charles
Last Name: Harris
Email Address: mondizzi@gmail.com
Affiliation: Marin County Bicycle Coalition (Member)

Subject: CAP AND TRADE FUNDING FOR BIKE/PEDESTRIAN INFRASTRUCTURE
Comment:

I am writing to request that funds from the California Cap and Trade Program be used to make major investments in the State's virtually nonexistent and woefully inadequate bicyle and pedestrian infrastructure. The fastest route to improving air quality in California is to reduce consumption of oil. The fastest and most dramatic way to reduce consumption of oil is to get people out of their cars and onto their feet and their bicycles. The fastest way to get people onto their feet and their bicycles is to provide convenient and SAFE pedestrian and cycle routes.

Probably no one would doubt that riding a bicycle or walking uses less oil than a motor vehicle, but the magnitude of the savings can be startling. Tom Murphy, an associate professor of physics at the University of California, San Diego, has calculated that a human on a bicycle gets as many as 1,300 mpg-equivalent, while a human walking achieves as many as 340 mpg-equivalent. so why are there so few cyclists and pedestrians using bicyles and boots to do their business?

The simple, straightforward and accurate answer is that the State's infrastructure for cycling and walking is, in a word, abominable. One often hears politicians say that they can't afford to invest in the infrastructure because there aren't enough cyclists and pedestrians to justify the investments, that they can't build facilities that will stand empty when the motor vehicle roads are gridlocked. But how many pedestrians and cyclists are prepared to risk a tussle with a harried motorist in a 5,000-lb. SUV - a tussle in which only one is likely to emerge unscathed? I ride my bicycle most everywhere I go, and I can say with some authority that, even living in "environmentally and socially-progressive" Marin County, riding a bicycle on the streets is unsafe. In fact, I am re-evaluating my use of a bicycle since being smacked two weeks ago by a Prius making a left turn from 4th Street in San Rafael.
Fortunately, I suffered only minor damage, though my bicycle did not fare so well. Since that incident, I have been plagued by images of what my body might have looked like if, instead of a Prius, the battering ram had been a Toyota Land Cruiser or a Cadillac Escalade. People don't ride on the roads, and pedestrians don't walk on the roads, because they are scared. It's just that simple - really.
Especially in California, with its mild winters and

predictable precipitation, if you build a safe infrastructure, people will use it.

So what kind of infrastructure is needed? Well, it's more than painting cute little pictures of bikes and writing nifty slogans like "Share the Road" on the pavement. First of all, motorists don't even notice those. Second, they don't make the road any wider, or eliminate a single parked car (you can only appreciate the danger of a parked car once you've been "car-doored" by a motorist who swings the driver-side door open right in front of you). The infrastructure that's needed comprises bicycle and pedestrian routes that are segregated from the motor vehicle traffic. There are many ways to achieve this, and organizations like the Marin County Bicycle Coalition can provide many examples of methods that have proven effective. Much can also be learned from countries such as The Netherlands and Denmark, which are light-years beyond us in providing safe bicycle and pedestrian infrastructure.

Also of utmost important is approaching the matter of infrastructure with the right attitude. "Transportation" has to mean, in the minds of the planners and engineers, more than "motor vehicle transportation". Cyclists and pedestrians must be given equal attention and consideration in making infrastructure investment decisions; in fact, I would argue that they must be given paramount consideration, given their physical vulnerability (no airbags on a bike, and the crush zone is your body!) and their past status as secondary - or non-existent - citizens.

Finally, an integral part of investing in cycling and pedestrian infrastructure is changing the perceptions and attitudes of motorists from of annoyance at the presence of cyclists and pedestrians to one of respect and appreciation of their extreme physical vulnerability and the contribution they make to improving the quality of our air and reducing our reliance on imported fossil fuels. Of equal importance is educating bicyclists and pedestrians on the responsibility they have to obey traffic rules and to respect the rights and vulnerabilities of drivers. The only thing I can imagine that would be as bad as being hit by a car is being the driver who hits a cyclist or pedestrian. In short, we are all in this transportation mess together, and we need to do our parts by obeying the rules and being considerate of each other.

Thank you for your time and attention.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 19:58:09

No Duplicates.

Comment 133 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeff
Last Name: Byron
Email Address: jbyron@cleantechopen.org
Affiliation: Cleantech Open

Subject: Comments on the Development of the Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Enclosed are the written comments from the Cleantech Open, a
non-profit organization whose mission is to find, fund and foster
entrepreneurs with big ideas that address today's most urgent
energy, environmental and economic challenges.  The Cleantech Open
is helping to develop young entrepreneurs and create some of the
new technologies that California, and the world, will need to
effectively reduce greenhouse gases.
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Attachment: www.arb.ca.gov/lists/com-attach/155-2013investmentpln-ws-VzQGbAFlV2VSOgN3.pdf

Original File Name: Cleantech Open Cover Ltr Nichols AB32 Proceeds .pdf

Date and Time Comment Was Submitted: 2013-03-07 21:24:34

No Duplicates.

Comment 134 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Bill
Last Name: Stewart
Email Address: billstewart@berkeley.edu
Affiliation: University of California, Berkeley

Subject: Family Forests can provide even greater climate benefits with support
Comment:

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See attached letter
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Attachment: www.arb.ca.gov/lists/com-attach/156-2013investmentpln-ws-UDZdOgNvBz1WPAF4.pdf

Original File Name: Family forest mgt plan support from C&T.pdf

Date and Time Comment Was Submitted: 2013-03-07 22:12:36

No Duplicates.

Comment 135 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Raymund
Last Name: Gallian
Email Address: rgallian@comcast.net
Affiliation: Sonoma Biochar Initiative

Subject: Support Biochar Funding
Comment:

Please consider Biochar production and use as a fundable climate mitigation strategy.
Climate Change will define our Brave New World.
The swirling power of the CO2 heat engine violently defines our Brave New World, with portents of devastation equal only to our human hubris, and represents a new conflagration that confronts our comfortable assumptions of normalcy, and the patterns of daily life.
The summer of 2012 the US confronted droughts, wildfires, and massive storms that knocked out power, followed by heat waves. Each repeated. Similar excesses were expressed worldwide.
Bill Mckibben notes that 350 PPM CO2 is the first data point in history to become a rallying cry. He offered these facts in his July 2012 Rolling Stone article “June broke or tied 3,215 high-temperature records across the United States. That followed the warmest May on record for the Northern Hemisphere - the 327th consecutive month in which the temperature of the entire globe exceeded the 20th-century average, the odds of which occurring by simple chance were 3.7 x 10-99, a number considerably larger than the number of stars in the universe. Meteorologists reported that this spring was the warmest ever recorded for our nation - in fact, it crushed the old record by so much that it represented the "largest temperature departure from average of any season on record." The same week, Saudi authorities reported that it had rained in Mecca despite a temperature of 109 degrees, the hottest downpour in the planet's history.”
Considering the energy already loaded in our atmosphere and ready to spring at the next tipping point, we know that at best, we face forced adaptation. We can plan for that to some degree and we must, but we also know that violent heat engine will express itself erratically. The lessons of that summer are just murmurs of what’s coming.
The summer of 2012 tested our fragile support systems and infrastructure, and found them wanting. Trains derailed due to heat-distorted tracks, roads buckled due to drought parched road base cracking, and overheated asphalt runways glued planes to the ground. July 12th, scientists verified that 97% of the Greenland ice surface had melted, forming continent wide pools.
These bullet points of Inconvenient Truth are the predicted makers of inevitable change. Each of these markers suggests a counterpoint and demands an imperative action on our part. Nature is sending us a message and we had better listen: we are not separate and we are not in charge. We must change to comply with Nature’s rules. And the last time I checked, Nature owned physics. Our adaptation must be informed by understanding, guided by wisdom, solved by

inspiration and built by skilled hands. It sounds like a jobs plan, and it is. It is also our emergency preparedness plan, and our survival plan. More importantly, this is also the path of mitigation, actively changing our circumstance. It is what sustainability looks like. We must feel, we must know, deeply, that our failure would be our undoing.

Guiding the implementation of AB32, the CARB must move quickly to slow and reverse the impact of climate change, and use all tools available. Biochar offers such a practical application, ready to move actively to the field, ready to build soil and sequester carbon, ready to filter nutrients.

We stand ready to offer Biochar for Our Brave New World- one big tool in a toolbox of survival responses. Reversing a 200 year pattern of mining carbon from the ground and dumping it in the air, we can re-mine carbon from the air through the plants that capture it, use new clean technology to process out the carbon into its stable, elemental form, Biochar, and store that carbon in soils. Biochar is the “fast mitigation technology” that promises to unload our imbalance. We can build a virtuous cycle, a positive feedback loop with biochar from biomass, sequestered in soils, benefitting agriculture. That benefit is demonstrated in increased water holding capacity and nutrient holding capacity, encouraging life and building topsoil.

Biomass, like the solar energy that built it, is diffuse. Similarly, technology must be scaled and deployed to match. A design goal here is to re-localize control of our inputs and outputs, where local biomass creates local jobs, local soils are built and agriculture improved. Where local carbon creates a global response.

Our goal at the Sonoma Biochar Initiative is to educate, advocate, and demonstrate the value of biochar production and use to benefit our climate and agriculture. Biochar demonstrates that not only is our climate crisis man made, but so is our solution.

Again, let me urge you to make Biochar production and use a fundable climate mitigation strategy.

Thank You,

Ray Gallian, Founder and Chief Biochar Advocate

Sonoma Biochar Initiative

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 22:09:12

No Duplicates.

Comment 136 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Allis
Last Name: Druffel
Email Address: allis@interfaithpower.org
Affiliation: California Interfaith Power & Light

Subject: Faith Sign-On Letter re: ARB's Investment Plan for Cap-and-Trade Revenues
Comment:

```
Hello.

Please find attached a letter signed by six California faith
organizations, providing input on ARB's Investment Plan for
cap-and-trade revenues. Thank you for the opportunity to give this
input. If there are any questions, please call or email me.

Sincerely,

Allis Druffel
Southern California Outreach Director
California Interfaith Power & Light
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Attachment: www.arb.ca.gov/lists/com-attach/158-2013investmentpln-ws-B2ZTJ1U2BAgAZQNi.pdf

Original File Name: ARB CAT Invstmt Plan Faith Letter.pdf

Date and Time Comment Was Submitted: 2013-03-07 23:03:50

No Duplicates.

Comment 137 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Daniella
Last Name: Alcedo
Email Address: dalcedo11@gmail.com
Affiliation:

Subject: Cap and Trade funds towards Active Tranportation
Comment:

I am the community organizer for the Pomona Valley Bicycle Coalition, a chapter of the Los Angeles County Bicycle Coalition and a member of the Sustainable Communities for All Coalition. I represent an area that is constantly ignored on the table and where are resources are too scarce to support our population. Pomona faces the all to common problems of low-income communities: Poor health, poor environment and poor and underfunded city programs. Cities, such as Pomona, are hit the hardest when it comes to environmental justice and the time to stop it is now and the way to do it is through Cap and Trade and investing the revenue wisely and fairly.

By putting more funds towards public transit, bicycle paths and lanes and better sidewalks and by making those funds more readily available to all cities, then can Green House Gas emissions go down; through a change of human behavior. Cities need to empower people to make the change and only proper funds can give cities the proper tools they need to make a real difference. I encourage you and urge you to allocate Cap and Trade funds towards active and public transportation projects and empower disenfranchised cities to make a positive impact in their community.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-07 22:50:14

No Duplicates.

Comment 138 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: John
Last Name: Currey
Email Address: john-currey@dixonrcd.org
Affiliation: Dixon Resource Conservation District

Subject: DRCD ARB Recommendations letter 3 8 13
Comment:

See Attached Comments

Attachment: www.arb.ca.gov/lists/com-attach/162-2013investmentpln-ws-VDBVIQBiBDNWDwZn.pdf

Original File Name: DRCD ARB Recommendations letter 3 8 13.pdf

Date and Time Comment Was Submitted: 2013-03-08 06:48:34

No Duplicates.

Comment 139 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Lisa
Last Name: Ward
Email Address: lisa.ward@clearedgepower.com
Affiliation: ClearEdge Power

Subject: ClearEdge Power Letter
Comment:

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ClearEdge Power recommendations for AB 32 revenues.
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Attachment: www.arb.ca.gov/lists/com-attach/163-2013investmentpln-ws-VjdSNlwCA2NQZFIN.pdf

Original File Name: AB 32 Revenue Workshop - Letter from ClearEdge Power.pdf

Date and Time Comment Was Submitted: 2013-03-08 06:43:36

No Duplicates.

Comment 140 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Niall
Last Name: Mateer
Email Address: nfj.mateer95@gmail.com
Affiliation:

Subject: Carbon capture and storage
Comment:

Thank you for providing the opportunity for public input into the appropriate disbursement of funds resulting from the cap and trade program allowance auctions. First, I would like to note the global interest in this program and that the implementation of the auction as well as the investment of the funds raised, are being keenly watched around the world. The international community is, once again, looking to California to lead the way to reduce GHG emissions through a variety of aggressive energy reduction measures.

A number of research reports have been issued in the past couple of years, in which California's energy future and GHG emission projections have been analyzed in great detail. These reports recognize that, with a phasing out of nuclear and coal-based electric generation and a planned major increase in the electrification of the transportation sector, there will emerge a major gap in electric generation by 2050. While California's continued investment in various energy efficiency, conservation, and renewable technologies is important and will, by 2050, have a major cumulative impact on the state's GHG emissions mitigation to conform with Governor's Executive Order S-3-05, these measures will not be sufficient to close the gap.

Other countries provide illustrative examples. Germany, for example, phased out its nuclear program and made a strategic decision to generate electricity from renewable resources in addition to efficiency programs. This admirable strategy nevertheless found that its renewable sector was unable to meet demand, that electricity prices have soared, and that the country has now approved a major re-investment in coal-based generation. Expert consensus is that the state's future energy demands and GHG emissions reductions will be met only by including low- to negative-carbon electricity and fuels generation. This means applying carbon capture, utilization, and storage, not only to natural gas power plants, but also to sources such as biomass plants or biofuel refineries. While technologies exist today to apply CCUS to these emissions sources, they are not optimized to compete with other GHG emissions reductions strategies, which often are subsidized, incentivized, and for which compliance methodologies exist.

I urge that the cap and trade auction proceeds should in part be directed to assist research, development and demonstration of this family of very critical technologies, including better capture and separation processes, utilization technologies such as manufacture

of building materials and biofuels, and storage options that may create or revitalize important energy industries in the state. In addition, using cap-and-trade auction revenues to develop sound methodologies to allow these technologies to be accepted compliance options would do much to facilitate their adoption by GHG emitters.

I would be pleased to share further details with the ARB.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 07:05:46

No Duplicates.

Comment 141 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Marty
Last Name: Melvin
Email Address: marty.melvin@vcrcd.org
Affiliation:

Subject: Cap & Trade Investments
Comment:

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Please see attached letter commenting on Cap & Trade investments.
Thank you
Marty Melvin
Executive Officer
RCD Ventura County
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Attachment: www.arb.ca.gov/lists/com-attach/165-2013investmentpln-ws-UTBVMQNdWTlXYwJd.pdf

Original File Name: AB 32 revenue investments 030713.pdf

Date and Time Comment Was Submitted: 2013-03-08 08:17:29

No Duplicates.

Comment 142 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: cheryl
Last Name: laskowski
Email Address: cheryllaskowski@gmail.com
Affiliation:

Subject: Comments to Cap & Trade revenue distribution guidance
Comment:

```
Please see the attached message.
Thank you,
Cheryl Laskowski, Ph.D.
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Attachment: www.arb.ca.gov/lists/com-attach/166-2013investmentpln-ws-Uz9UMwZ0VGwHblcg.pdf

Original File Name: Laskowski_C&T_comment_03082013_0852.pdf

Date and Time Comment Was Submitted: 2013-03-08 08:54:58

No Duplicates.

Comment 143 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 144 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: cheryl
Last Name: laskowski
Email Address: cheryllaskowski@gmail.com
Affiliation:

Subject: Edit of previous submission: Please use this attachment
Comment:

```
Please find comments to the investment guidance attached.

Sincerely,
Cheryl Laskowski, Ph.D.
```

Attachment: www.arb.ca.gov/lists/com-attach/168-2013investmentpln-ws-BWkCZQR2WWFQOQB3.pdf

Original File Name: Laskowski_C&T_Final.pdf

Date and Time Comment Was Submitted: 2013-03-08 09:12:52

No Duplicates.

Comment 145 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Sofia
Last Name: Parino
Email Address: sparino@crpe-ej.org
Affiliation: Center on Race, Poverty & the Environmen

Subject: Funds should be spent within 6miles of cap and trade facilities
Comment:

Please see uploaded letter for signatures, footnotes, and attachment. A copy of the text is below:

To: California Air Resources Board, Department of Finance, and Office of the Governor

The Center on Race, Poverty & the Environment (CRPE) submits these comments on the Cap and Trade Auction Proceeds Investment Plan on behalf of the undersigned individuals and organizations. We believe that funds and projects under this Investment Plan should be directed to communities that fall within a 6 mile radius of facilities regulated under Cap and Trade. Communities that are located in this area are more severely impacted by co-pollutants and bear the burden of a Cap and Trade system.

To be clear, we are vehemently opposed to California's Cap and Trade system. Cap and Trade allows polluters to pay their way out of making real on-site reductions at the expense of low-income communities, communities of color, and indigenous communities. Cap and Trade ignores the reality that location matters. Reductions of greenhouse gases on-site reduces the co-pollutants emitted into the surrounding community – a benefit that is forgone when that facility buys allowances or offsets for planting trees somewhere else. While we are opposed to Cap and Trade and profits made at the expense of our communities' health, we feel we had to engage in this process to keep our communities from being further ignored and harmed by these policy decisions. Any proceeds from Cap and Trade should be invested back into the communities that are paying the highest price for this system – communities within 6 miles of a Cap and Trade facility.

Populations living within 6 miles of industrial facilities disproportionately bear the impacts of co-pollutant emissions, such as particulate matter and toxics. Over two-thirds of California's low-income African Americans and about 60% of low-income Latinos and Asian/Pacific Islanders live within 6 miles of a Cap and Trade facility. Under Cap and Trade, the residents of these communities will not receive the benefit of co-pollutant emission reductions, and could even see an increase in emissions, if facilities purchase allowances and offsets as Cap and Trade allows. This violates federal civil rights laws. When comparing health effects of co-pollutants, actual disparate impacts on people of color are even more severe than can be captured by discrepancies in exposure alone, as a result of the particular vulnerabilities of this population. As the California Department of Public Health (CDPH)

explained in its 2010 Health Impact Assessment of Cap and Trade,

[l]ow-income communities and communities of color in California are disproportionately impacted by environmental exposures and have a greater susceptibility to the negative health impacts of environmental risk because of existing health and socioeconomic vulnerabilities.

Co-pollutant exposures from Cap and Trade facilities add to the tremendous cumulative exposures to a variety of environmental stressors borne predominantly by people of color. As people of color tend to be more susceptible to health risks and have lower access to services to mitigate negative health outcomes, exposures to co-pollutants are “exacerbated by poverty, poor quality housing, and insufficient health care access in these communities.” The resulting picture is one of stark discrepancies in both exposures and health outcomes.

Because of this, we believe that all cap and trade proceeds should be directed back into those census blocks within a 6 mile radius of cap and trade facilities. Given the high rate of minority and low income communities found within 6 miles of a regulated facility, this prioritization would likely meet the mandates of AB 1532 that at least 25% of the investment benefit “disadvantaged communities” and SB 535 requiring that at least 10% of investments occur within “disadvantaged communities.”

There is no amount of money that can remedy the disproportionate impact that the Cap and Trade system inflicts on low-income communities, communities of color, and indigenous communities. While we continue to strive toward a fair and just solution to reducing greenhouse gases in California, we sincerely hope that you do not continue to ignore our communities and that you will take this small step toward recognizing that our communities – low income communities and communities of color – are paying the true cost of Cap and Trade with our health.

Attachment: www.arb.ca.gov/lists/com-attach/169-2013investmentpln-ws-VztWNVciV3ACYVcl.zip

Original File Name: Letter on Auction Proceeds.zip

Date and Time Comment Was Submitted: 2013-03-08 08:58:12

No Duplicates.

Comment 146 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kelly
Last Name: Pretzer
Email Address: kelly.pretzer@sfgov.org
Affiliation: City of San Francisco, Mayor's Office

Subject: City of San Francisco Comments re: Cap and Trade Investment Plan
Comment:

March 8, 2013

Mary D. Nichols
Chair, California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear Chair Nichols:

Thank you for the opportunity to provide input as the Air Resources Board and Department of Finance develop an investment plan for the Greenhouse Gas Reduction Fund. San Francisco has long been at the fore of progressive environmental policy and greenhouse gas reduction. Our comments are provided with a single goal – to ensure that the greatest, most cost effective statewide greenhouse gas emissions reductions are achieved.

Every dollar of cap-and-trade auction proceeds invested in cities and urban areas – and therefore invested in areas that generate highest emissions – would see the greatest emissions reduction returns. It is imperative to prioritize investment in sectors that generate the largest greenhouse gas emissions in order to achieve the optimal cost/benefit reduction of emissions. Finally, an emphasis on proven reduction strategies that can be easily replicated in other jurisdictions would generate the greatest impact.

The attached document provides general investment principles and example project proposals. The City and County of San Francisco is eager to assist you and your organization as you continue this important work.

Sincerely,
Edwin M. Lee
Mayor

Attachment: www.arb.ca.gov/lists/com-attach/170-2013investmentpln-ws-BWYGaVUgWHJVDAVq.pdf

Original File Name: City of San Francisco CARB Investment Plan Comments 3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 09:37:28

No Duplicates.

Comment 147 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: John
Last Name: Brodie
Email Address: info@sjcrcd.org
Affiliation: San Joaquin County RCD

Subject: Comment Letter on AB 32 Investments
Comment:

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Please see attached letter on behalf of our Board.
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Attachment: www.arb.ca.gov/lists/com-attach/171-2013investmentpln-ws-BmcFYVRmVTRReQFx.pdf

Original File Name: AB32.pdf

Date and Time Comment Was Submitted: 2013-03-08 09:40:32

No Duplicates.

Comment 148 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ritu
Last Name: Garg
Email Address: ritu091@gmail.com
Affiliation:

Subject: Investment plan for cap-and-trade auction revenues
Comment:

March 8, 2013
Ms. Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento CA 95814

Dear Chair Nichols:

I am recent graduate from UC Berkeley with a Bachelor's in Civil and Environmental Engineering. As someone who has studied infrastructure development and believes in key role transportation plays in transforming our cities and regions into more sustainable places, I would like to use this letter to express my strong support for the Sustainable Communities For All proposal. The goals outlined by SB 375 can be reached by reinforcing transportation and housing choices that minimize the need to drive cars, reduce monetary costs, and provide new opportunities, especially for low-income families.

According to a recent report by the California Housing Partnership Corporation, preserving and building affordable homes near transit will allow California to achieve the maximum VMT and GHG-reduction benefits of investment in transit infrastructure and transit-oriented development.

Sprawl and congestion are also bad for health - each additional hour spent in a car per day is associated with a 6 percent increase in the likelihood of obesity. Investing in safe bicycle and pedestrian infrastructure and programs like Safe Routes to School improves health in both urban and rural areas, and especially in minority communities where pedestrians are significantly more likely to be killed by vehicles.

Investments like these will have the greatest impact on the communities most affected by climate change while also increasing access to opportunities.

Thank you for considering my comments,

Sincerely,

Ritu Garg

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 09:38:12

No Duplicates.

Comment 149 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Shelly
Last Name: Sullivan
Email Address: ssullivan@onemain.com
Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding CARB's Cap-and-Trade Revenue Investment Plan Workshop(s)
Comment:

```
Attached please find comments from the AB 32 Implementation Group
regarding CARB's cap-and-trade revenue investment plan
workshop(s).

Should you have any questions or need anything further, please feel
free to contact Shelly Sullivan at (916) 858-8686
```

Attachment: www.arb.ca.gov/lists/com-attach/173-2013investmentpln-ws-UTAHYwdZAmJSZgVa.pdf

Original File Name: AB 32 IG_ Auction Revenue Proceeds Comments_3_8_13.pdf

Date and Time Comment Was Submitted: 2013-03-08 09:51:11

No Duplicates.

Comment 150 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Judy
Last Name: Curry
Email Address: fargojay@aol.com
Affiliation: Women For: Orange County

Subject: Support for the Green Vision Project
Comment:

March 7, 2013

California Air Resources Board P.O. Box
2815  Sacramento, CA 95812

RE: Comments on the ARB Draft Investment Plan

Dear Air Resources Board:

Thank you for the opportunity to comment on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan). Women For: Orange County is based in Orange County, California and our mission is Working for a Better World - a grassroots advocacy organization founded in 1984. Our organization includes support from over 200 residents in the county. We are writing to provide substantive comments on the Draft Investment Plan as it relates to natural resources and conservation.

We support better alignment with AB 1532's mandates as it relates to natural resources and conservation strategies as a mechanism to reduce emissions. The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions (GHG) through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of GHG emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the GHG Reduction Fund shall appropriate funds towards one of several items, including the reduction of GHG emissions associated with water use and supply, land and natural resources conservation and management, forestry, and sustainable agriculture. Yet, not a single conservation strategy is outlined in the Investment Plan that furthers this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions. 

Existing funding sources could be leveraged to increase conservation dollars and reduce greenhouse gas emissions. There are numerous types of conservation funding from local government general funds, development fees, grant funds allocated from the federal Endangered Species Act, funding from California's General

Obligation (GO) bond measures and many other sources. To continue to implement a regional conservation plan, ongoing funding sources is needed to meet conservation objectives and to complete the conservation vision. Any cap and trade revenues available for regional conservation plans would be a much needed boost to the conservation effort while concurrently meeting emission reduction targets.

Thank you for your time and the opportunity to provide feedback to the Air Resources Board on the Draft Investment Plan.

Sincerely,

Judy Curry 
Environmental Chair
Women For: Orange County

cc: Cliff Rechtschaffen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 09:51:18

No Duplicates.

Comment 151 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Anthony
Last Name: Giaccio
Email Address: anthony@winetrain.com
Affiliation: Napa Valley Wine Train

Subject: AB32 Investment plan for CNG/Hybrid Commuter Locomotives
Comment:

```
CNG/Hybrid locomotive system public comments and attachment
submitted by David Cook at Energy Conversions and use the AB32
funds as an investment to move this technology forward.  Further it
would be a good idea to make this a project pursuant to SB170  (
Pavley ) where the funding agencies get a return on investment as
these systems get sold across North America, these returned funds
could be used to offset the costs to perform the upgrades to
California base commuter locomotives.

The Napa Valley Wine Train has been partnering with Energy
Conversions since 2004 when we performed one of the first Diesel to
100% Natural Gas locomotive conversions.  Over the past ten years,
when used to perform our 36 mile train excursions, our NVR73 100%
CNG Locomotive has displaced over 200K gallons of diesel fuel.

I have attached an updated CNG Hybrid Commuter Article for your
review.

Anthony Giaccio, CEO/CFO
Napa Valley Wine Train, Inc.
winetrain.com
```

Attachment: www.arb.ca.gov/lists/com-attach/175-2013investmentpln-ws-VTYHb1E3UFwBb1Mq.pdf

Original File Name: CNG Hybrid Commuter Article.pdf

Date and Time Comment Was Submitted: 2013-03-08 09:35:39

No Duplicates.

Comment 152 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Amy
Last Name: Mmagu
Email Address: amy.mmagu@calchamber.com
Affiliation: California Chamber of Commerce

Subject: CalChamber Comments on Auction Revenue
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/176-2013investmentpln-ws-BmVSNV0wWGgGaAlo.pdf

Original File Name: CalChamber Auction Revenue Comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 10:22:32

No Duplicates.

Comment 153 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 154 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Judith
Last Name: Mitchell
Email Address: judy@missionrcd.org
Affiliation: Mission Resource Conservation District

Subject: Investment plan for Cap-and-Trade Program
Comment:

March 8, 2013

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

Dear Chairman Nichols,

Mission Resource Conservation District has been actively involved in farmland preservation, watershed protection and natural resource conservation in San Diego County. We feel it is imperative that investments of AB 32 revenues be used to support RCD efforts in these areas throughout the state in creating a long term response to California's pressing GHG reduction needs.

1) Conserve working lands including farmland, forest and range.
Conserving lands from urban development reduces the total vehicle miles teraveled, creates lands that serve as sinks for carbon in plant and soils, and creates strong rural economies that serve as the backbone for California's economy.

Programs to invest in include:

California Farmland Conservation Program housed in the Department of Conservation
Williamson Act Subvention Funds
Farmland Mapping and Monitoring Program housed in the Department of Conservation
Resource Conservation Districts for on-the-ground projects.

2) Conserve wildlands, parks and natural areas
Conserving properly managed wildlands creates carbon sinks in plants and soils while providing for the natural heritage that makes California unique.

Programs to invest in include:

The Wildlife Conservation Board
Deoartment of Fish and Game easement programs
Resource Conservation Districts for on-the-ground conservation projects

3) Provide stewardship of California's watersheds

We make a strong recommendation to support the Statewide Watershed Program and the Resource Conservation District Assistance Program both housed in the Department of Conservation.

Mission Resource Conservation District hopes that emphasis for AB 32 will have multiple benefits with a commitment to strong rural economies and the preservation of California's unique natural resources.

Thank you for your consideration,

Judith Mitchell
District Manager
Mission Resource Conservation District

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 10:10:57

No Duplicates.

Comment 155 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Robert
Last Name: Jordan
Email Address: robmjordan@gmail.com
Affiliation:

Subject: Carbon Tax = Clean Transit Funds
Comment:

```
It would be logical if cap-and-trade proceeds went toward greater
investment in public transportation, walking, biking, and
affordable housing near transit.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 10:30:41

No Duplicates.

Comment 156 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Colleen
Last Name: Foster
Email Address: cfoster@ci.oceanside.ca.us
Affiliation: City of Oceanside

Subject: Comments in response to 2013 Investment Plan-WS
Comment:

This letter is in response to the Air Resources Board solicitation for stakeholder input on the development of an investment plan for the auction proceeds from the AB 32 Cap-and-Trade program to reduce greenhouse gas emissions. Furthermore, AB 1532 and Senate Bill 535 provides a legislative framework that requires the investment plan to fund greenhouse gas reductions through energy efficiency, clean energy generation, efficient goods movement, water and land use, waste reduction, and research/commercialization of new technologies. The waste reduction objective within this framework are concurrent with the State and the City of Oceanside's own zero waste goals and policies, both of which calls for a 75% recycling rate by 2020. As the City of Oceanside's solid waste manager, I strongly encourage the allocation of financial support to organics processing and recycling market development as a primary step in our State's clean air goals.

Increased capacity for organics (green waste and food waste) processing and collection infrastructure can significantly reduce landfill methane emissions. Compost application results in additional reduced emissions as compared to chemical fertilizers, due to compost being less energy-intensive, water efficient and beneficial to supporting improved soil sequestration. Direct and ongoing incentives for composting and digestion facilities through this investment plan will provide the greatest opportunity in both the short and long term. Immediate investments in grants and loans to capitalize new and expanded facilities would have a significant impact in reducing our waste stream, while also reducing methane emissions from the decomposition of these materials in our landfills.

Additionally, please consider incorporating increased investment into recycling market development. Expansion of recycling markets is necessary in order to grow domestic outlets for recycled materials. Funding support for recycling markets would spur economic development and investment in California recycling infrastructure. Recycling manufacturing avoids emissions from raw materials extraction, primary processing, transportation, and refining. Recycling also promotes forest carbon sequestration, and directly reduces manufacturing emissions by displacing virgin materials which require more energy for processing, and generate more waste. Reintroducing discards with intrinsic energy value back into manufacturing processes will create more local jobs by supporting in-state processing and manufacturing with recycled feedstock.

I greatly appreciate your consideration of my comments.

Thank you,
Colleen Foster

Solid Waste and Recycling
Water Utilities Department
City of Oceanside
300 North Coast Hwy
Oceanside, CA 92054

Attachment: www.arb.ca.gov/lists/com-attach/180-2013investmentpln-ws-UzpSOgN0UGYFcARw.pdf

Original File Name: Investement Plan Comment Letter (Cap-and-Trade Revenue).pdf

Date and Time Comment Was Submitted: 2013-03-08 10:26:24

No Duplicates.

Comment 157 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joe
Last Name: Grindstaff
Email Address: jgrindstaff@ieua.org
Affiliation: Inland Empire Utilities Agency

Subject: Comments Letter on Allocation of Cap-and-Trade Proceeds
Comment:

```
Please accept the attached comment letter regarding the Draft
Concept Paper for the Cap-and-Trade Auction Proceeds Investment
Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/181-2013investmentpln-ws-AmNXI1MwBwsFYFMM.pdf

Original File Name: ARB C&T Comment Letter 3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 10:44:37

No Duplicates.

Comment 158 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Hasan
Last Name: Ikhrata
Email Address: ombcomm@arb.ca.gov
Affiliation: Association of Governments

Subject: Cap and Trade Investment Plan
Comment:

See attachment

Attachment: www.arb.ca.gov/lists/com-attach/182-2013investmentpln-ws-UzAGYVEgU19WD1Qg.pdf

Original File Name: Cap Trade Plan Comment Letter - 3_7_2013.pdf

Date and Time Comment Was Submitted: 2013-03-08 10:54:50

No Duplicates.

Comment 159 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tess
Last Name: Lengyel
Email Address: tlengyel@alamedactc.org
Affiliation: Alameda County Transportation Commission

Subject: Comments on 2013 Cap and Trade Investment Plan
Comment:

```
Please find attached a comment letter from the Alameda County
Transportation Commission on the Cap and Trade Investment Plan.
This letter is in support of the Transprotation Coalition for
Livable Communities proposal.
```

Attachment: www.arb.ca.gov/lists/com-attach/183-2013investmentpln-ws-VjVcOwd2VmQHbwlt.pdf

Original File Name: CapandTradeLetter to CARB_AlamedaCTC_030813.pdf

Date and Time Comment Was Submitted: 2013-03-08 10:58:45

No Duplicates.

Comment 160 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mike
Last Name: Robson
Email Address: mike@edelsteingilbert.com
Affiliation: Glass Packaging Institute

Subject: 2013 Investment Plan -WS
Comment:

```
Zenia,
Please accept this resubmittal of comments from the Glass Packaging
Institute on the 2013 Cap and Trade Revenue Investment Plan.
Thanks
```

Attachment: www.arb.ca.gov/lists/com-attach/184-2013investmentpln-ws-UjVXIVQ8V1sAZQNs.pdf

Original File Name: GPI Comments Cap and Trade Auction Revenue 3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:02:52

No Duplicates.

Comment 161 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tracy
Last Name: Delaney
Email Address: tdelaney@phi.org
Affiliation: Public Heatlh Alliance of So. California

Subject: Public Heatlh Alliance of So. California Cap and Trade Revenue Letter
Comment:

```
Please see the attached letter from the Public Heatlh Alliance of
So. California regarding investment plan for Cap and Trade auction
proceeds.
```

Attachment: www.arb.ca.gov/lists/com-attach/185-2013investmentpln-ws-B3cFdlAzAj1VOlIx.pdf

Original File Name: Public Health Alliance Cap and Trade Revenues 3.8.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:11:26

No Duplicates.

Comment 162 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Brooke
Last Name: Kuhn
Email Address: brookekuhn@gmail.com
Affiliation:

Subject: Support for the Sustainable Communities for All Proposal
Comment:

Dear Chair Nichols:

As a transit rider and pedestrian, I would like to express my strong support for the Sustainable Communities for All Proposal. I believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

I serve on the Walk San Francisco Board and am a big believer in making our streets safer for pedestrians.

I believe it is critical to build both homes and transit that are affordable and accessible to lower-income households, while supporting active transportation to improve health. Just this week, the Census Bureau named the San Francisco area the nation's "megacommuter" capitol – people who travel at least 50 miles and 90 minutes to work – with San Jose close behind. When people are priced out of homes near job centers and high-quality transit hubs, they must drive long distances to work.

According to a recent report by the California Housing Partnership Corporation,
preserving and building affordable homes near transit will allow California to achieve the maximum VMT and GHG-reduction benefits of investment in transit infrastructure and transit-oriented development.

Sprawl and congestion are also bad for health - each additional hour spent in a car per day is associated with a 6 percent increase in the likelihood of obesity. Investing in safe bicycle and pedestrian infrastructure and programs like Safe Routes to School improves health in both urban and rural areas, and especially in minority communities where pedestrians are significantly more likely to be killed by vehicles.

Investments like these will have the greatest impact on the communities most affected by climate change while also increasing access to opportunities.

Thank you for considering my comments,

Sincerely,

Brooke Kuhn

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 11:21:05

No Duplicates.

Comment 163 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Alex
Last Name: Cousins
Email Address: ombcomm@arb.ca.gov
Affiliation: Trinity County Resource Conservation

Subject: Submitting comment on Cap-and-Trade Auction Proceeds Investment Plans
Comment:

See attachment

Attachment: www.arb.ca.gov/lists/com-attach/187-2013investmentpln-ws-VSFTNgBzAjILaQBf.pdf

Original File Name: TCRCD to CARB AB32.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:29:33

No Duplicates.

Comment 164 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Elise
Last Name: Kalfayan
Email Address: ekalfayan@sbcglobal.net
Affiliation:

Subject: CAT Auction Proceeds to Zero-Emission Goods Movement and Expanded Transit Funding
Comment:

California Cap and Trade Auction Proceeds should be used to explore new infrastructure concepts for zero emissions goods movement and freight technologies.

Goods movement and freight operations generate a great deal of GHG. Current practices, even if trucks are held to stricter emissions standards, also have major traffic congestion and safety challenges. Using electrified zero-emission freight loading and rail systems to distribute goods both locally and to distribution centers for loading on heavy rail, will improve air quality and health, reduce congestion and traffic dangers, and create jobs.

GRID II is an example of a forward-looking goods movement system for the region that meets and exceeds AB 32 and SB 375 mandates. It provides on-dock, zero-emission loading and rail transport for goods movement, instead of near-dock truck loading projects that communities are mobilizing against.

In addition, CAT auction proceeds should be used to expand public transit options-including BRT and LRT-and active transportation infrastructure, rendering conventional freeway expansions to accommodate more trucks and more cars unnecessary.

These investments will provide healthier, safer, and more efficient ways of moving people and goods.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 11:11:37

No Duplicates.

Comment 165 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tricia
Last Name: Almiron
Email Address: talmiron@sanbag.ca.gov
Affiliation: SANBAG

Subject: SANBAG Comments on Cap and Trade Investment Plan
Comment:

```
Letter is attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/189-2013investmentpln-ws-UD1QOFZmUTEFM1Vm.pdf

Original File Name: MN130308-RW.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:13:56

No Duplicates.

Comment 166 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Julee
Last Name: Malinowski Ball
Email Address: julee@ppallc.com
Affiliation:

Subject: COMMENTS Re: CARB Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Attached please find comments from the California Biomass Energy
Alliance (CBEAS) regarding CARB Cap-and-Trade Auction Proceeds
Investment Plan.  Thank you for your kind attention and
consideration in this matter.
```

Attachment: www.arb.ca.gov/lists/com-attach/190-2013investmentpln-ws-VDcHYwFlVGZSCwBm.pdf

Original File Name: CBEA FINAL CARB Cap and Trade Auction Proceeds Investment Plan Comments 3-7-13.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:36:08

No Duplicates.

Comment 167 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Marisa
Last Name: Yeager
Email Address: yeagerm@metro.net
Affiliation: Los Angeles County Metro

Subject: LAC Metro Comments
Comment:

```
Please accept this letter from Los Angeles County Metropolitan
Transportaiton Authority.
```

Attachment: www.arb.ca.gov/lists/com-attach/191-2013investmentpln-ws-AG0AY1AlUXAFbFAP.pdf

Original File Name: Metro Comment Letter to CARB. 03.08.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:44:28

No Duplicates.

Comment 168 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Debbie
Last Name: Lou
Email Address: dlou@ucsd.edu
Affiliation: Active Living Research

Subject: Cap & Trade revenue for public transit and health
Comment:

```
Please find attached a letter of support for using cap and trade
auction revenues to fund health-promoting transit and affordable
housing.
```

Attachment: www.arb.ca.gov/lists/com-attach/192-2013investmentpln-ws-UzBWMQZ3V1sEXQVx.docx

Original File Name: Cap Trade Revenue for Public Health_ALR letter.docx

Date and Time Comment Was Submitted: 2013-03-08 11:46:16

No Duplicates.

Comment 169 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: James
Last Name: Brady
Email Address: james.brady59@gmail.com
Affiliation:

Subject: Urban Green Agriculture
Comment:

I am deeply concerned that Urban Agriculture has not been discussed more in previos webinars and at a recent meeting I attended in Sacramneto. I am equally concerned that the African American Communities that are in most distressed areas will get isolated once again! Looking at the Maps that were displayed depicted very high levels of GHG emissions as well serious health disparities in these communities. I would suggest that Urban Gardens, can help to reduce emissions and health with the development of Urban Garden and Edible Parks. I am an Urban Farmer (con10u2Farm)who has solutions to help reduce the goals of AB32.
We simply have to have minorities points of view as this process moves forward. While air quality is critical to our State's ability to reduce emissions over the next decade, we need to develop food cells/security so that fossil fuels standards are met in the community as well.
It is vital that we have healthy communities and the best way to achieve this is through planting Urban Gardens and edible parks along with creating use of green alleysways. The land trust organizations did not even cover concerns of the urban communities. One organization talked about ($$) for Boodekker park in San Francisco. Funds should not be used for such foolish projects that waste taxpayers money, to be sure it's a poor area in a rich city, just not a good idea for funding.
Urabn Agriculture should be toping the list of projects that are currently being considered for funding. I have attended dozens of meetings over the past 5 years and spoke on the reduction goals and now advocating for Urban gardens. California Health is it's wealth and the best way to achieve this is taking care of it's people by making available fresh locally grown foods that are grown nearby. We have a profliferation of food deserts all over the California that needs to be addressed. Con10u2Farm, would like to help develop this concept to enhance and improve the way future communities are designed through Urban Garden concepts. Education and outreach will also be part of the plan to birth the concepts. A new social enterprise can be born to deal with high employment rates as well, agriprenuers who are the future Urban Famers in California will be trained to grow local food cells. The recycling of organic waste is another great opportunity for Urban farmers to create offsets for their community. I would be delighted to provide valuable imput on this concept and further provide the pathway to implementation around our beautiful state for Urban Gardens,Edible Parks and Alleyways.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 11:54:55

No Duplicates.

Comment 170 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mary
Last Name: Small
Email Address: msmall@scc.ca.gov
Affiliation: State Coastal Conservancy

Subject: comments on draft investment plan
Comment:

```
The attached letter urges the California Air Resources Board and
the Administration to include natural resource protection, wetland
restoration, working land conservation and trail construction in
the initial three year AB 32 cap and trade investment plan.
Inclusion of funding for these natural and green infrastructure
investments in the plan would help California effectively and
efficiently meet the goals of AB 32 and other state climate
polices, including AB 1532, SB 535, and SB 375.
```

Attachment: www.arb.ca.gov/lists/com-attach/195-2013investmentpln-ws-WilUMVAyUV0GYwdo.pdf

Original File Name: SCC comment letter investment plan.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:57:26

No Duplicates.

Comment 171 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michael
Last Name: Boccadoro
Email Address: mboccadoro@dolphingroup.org
Affiliation: AECA

Subject: Investment Plan Comments of AECA
Comment:

March 8, 2013

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

Re: Allocation of Cap & Trade Proceeds

Dear Chair Nichols:

The Agricultural Energy Consumers Association (AECA) appreciates the opportunity to submit these comments on the Cap-and-Trade Auction Proceeds Investment Plan Draft Concept Paper. AECA strongly supports two key funding recommendations outlined in the Cap-and-Trade Auction Proceeds Investment Plan Draft Concept Paper and looks forward to working with CARB's staff to further develop program funding options.

Diesel to Electric Agricultural Pump Conversions
Conversion of diesel agricultural pumping engines to electric motors is a proven, highly effective greenhouse gas reduction and air quality improvement program. According to the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD), the existing conversion program is among the most cost effective programs they have ever implemented and represents an important opportunity to provide environmental benefits to disadvantaged communities throughout the San Joaquin Valley. While existing programs have been highly successful, they are set to soon expire (the program has been closed to new applicants since 2007) and several thousand diesel pumping engines continue to operate in the San Joaquin Valley. Funding to extend and expand the existing program could build on the substantial air quality benefits already achieved. Projects funded under existing programs by the SJVAPCD alone account for lifetime reductions of over 18,000 tons of NOX, 503 tons of PM and hundreds of thousands of tons of CO2.
The existing Agricultural Internal Combustion Engine (AG-ICE) Program was a joint program developed and supported by the AECA, California Farm Bureau Federation, the state's Investor Owned Utilities (IOUs) and state and regional air quality officials. The AG-ICE Program was approved by the California Public Utilities Commission (CPUC) in 2005. The program was highly successful due to the electricity rate certainty and conversion incentives provided to program participants. AECA worked closely with the IOUs to design electricity rates that were highly competitive with diesel

operating costs and minimized risk of electric rate increases in future years (limited to 1.5% annual increases) during the 10 year program. No other rate changes were permitted for program participants. Additional funding was provided for “line extensions”, based on an environmental adder (benefits) to offset upfront capital costs of connection to the electric grid. Finally, funding was provided by regional air districts (Carl Moyer) to offset electric motor costs and additional line extensions needed for conversion. The programs significant success was due to clear price signals, appropriate incentives to reduce upfront costs and rate certainty to ensure program benefits would not be changed for at least 10 years.

AECA and its member agricultural associations believe we have a critical opportunity to extend and expand the existing AG-ICE program, representing an important funding opportunity for CARB. Initial discussions with SJVUAPCD officials indicate strong support for such a program. AECA is prepared to work with SJVUAPCD and CARB to provide the critical resources to review and re-design an efficient and effective program expansion and extension to both maintain existing conversions and expand the number of conversions to the maximum cost effective extent possible. Time is of the essence, as existing Tier 1 and Tier 2 diesel engines will begin being required to be replaced by January 1, 2015. AECA believes a cost effective program can be established if funding for line extensions and motor conversions can be made available from the Cap and Trade allowance auction proceeds during the 2013-2014 funding cycle. Funding for this program represents a unique “clean energy” opportunity to further achieve substantial direct reductions in carbon dioxide (CO2), greenhouse gas, as well as criteria pollutants such as particulate matter (PM) and oxides of nitrogen (NOX) in the Sacramento and San Joaquin Valleys and the multiple disadvantaged communities located there.

Sustainable Agricultural Bioenergy Projects

AECA also strongly supports and associates itself with the comments submitted by the Bioenergy Association of California regarding investment in bioenergy projects. Agricultural bioenergy projects, including biomass gasification projects and dairy biogas projects have the potential to provide the most direct greenhouse gas reduction benefits of any projects being considered. Dairy biogas projects, in particular, are among the most effective measures with the ability to reduce as much as 6 million metric tons of CO2 equivalent emissions by capturing methane and converting it to renewable electricity and transportation fuels. Dairy digesters not only provide emission reductions by capturing and destroying methane emissions at dairies but also produce substantial GHG reduction benefits by displacing fossil fuel use for energy (electricity) and transportation fuel.

Equally important, dairy digesters provide one of only four opportunities for approved carbon offsets under the Cap and Trade program. As CARB has repeatedly recognized in the implementation of AB 32, offsets are an important tool to provide flexibility and cost containment for regulated entities. Finally, dairy digesters represent an important opportunity to reduce diesel emissions in the San Joaquin Valley as a viable transportation fuel source. Conversion of dairy biogas to renewable compressed natural gas (RCNG) represents an important opportunity to replace diesel burning fleets in the San Joaquin Valley with low-carbon RCNG. Dairy biogas to RCNG actually has the ability to create carbon-negative transportation fuel because of the combined methane capture and fossil fuel displacement. The resulting reductions in diesel particulate matter emissions would also go a long way to improving air quality for valley residents in the multiple

disadvantage communities throughout the valley. The commercialization of dairy biogas to RCNG projects represents the exact sort of “transformative” program CARB is seeking to fund with revenues from the AB 32 program.
Despite their significant benefits, dairy digesters remain uneconomical due to high environmental compliance costs and low or non-existent energy power purchase agreements. As a result, funding to incubate and incentivize sustainable agriculture bioenergy projects is critically needed to ensure commercialization of this industry and the “transformative” clean transportation benefits they promise.

Conclusion
AECA again appreciates the opportunity to provide input to CARB and the Department of Finance as you craft an investment plan for Cap and Trade auction revenues. AECA firmly believes both of the program funding opportunities outlined above represent unique opportunities for CARB to invest resources in programs that have proven and demonstrated direct greenhouse gas and criteria pollutant reduction potential, as envisioned by AB 32. Moreover, the air quality benefits will accrue to the numerous disadvantaged communities identified by CARB in the San Joaquin Valley as required under SB 535 (2012, de Leon).

Sincerely,

Michael Boccadoro
Executive Director

Attachment: www.arb.ca.gov/lists/com-attach/197-2013investmentpln-ws-UzpQOAN0WW8BdFAk.pdf

Original File Name: Investment Plan Comments 3 8 2013.pdf

Date and Time Comment Was Submitted: 2013-03-08 11:57:38

No Duplicates.

Comment 172 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kenneth
Last Name: Berlin
Email Address: kenneth.berlin@skadden.com
Affiliation: The Coalition for Green Capital

Subject: Coalition for Green Capital - Comments on Investment of Cap-and-Trade Auction Proceeds
Comment:

```
Attached please find comments filed on behalf of the Coalition for
Green Capital.
```

Attachment: www.arb.ca.gov/lists/com-attach/198-2013investmentpln-ws-VzRVPFMzWWYLZAJ2.pdf

Original File Name: Coalition for Green Capital - Comments on Investment of Cap-and-Trade Auction Proceeds.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:09:30

No Duplicates.

Comment 173 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Nathan
Last Name: Voegeli
Email Address: nvoegeli@yuroktribe.nsn.us
Affiliation: Yurok Tribe

Subject: cap and trade auction investment plan comment
Comment:

```
See attached letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/199-2013investmentpln-ws-WjYHZFEkVXIKaQZ0.pdf

Original File Name: Letter re cap trade auction proceeds for tribal disadvantaged communities_v3.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:12:59

No Duplicates.

Comment 174 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Beth
Last Name: Vaughan
Email Address: beth@beth411.com
Affiliation:

Subject: Cap-and-Trade Auction Proceeds Investment Plan Comments
Comment:

```
see attached
```

Attachment: www.arb.ca.gov/lists/com-attach/200-2013investmentpln-ws-ATJddlRtB3kHMFdk.pdf

Original File Name: 3-8-13_CCC_Investment Plan reccs to ARB.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:12:54

No Duplicates.

Comment 175 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Neal
Last Name: Coonerty
Email Address: neal.coonerty@co.santa-cruz.ca.us
Affiliation: Santa Cruz Co. Board. of Suprvs.

Subject: ARB COMMENT LETTER
Comment:

```
Please see attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/201-2013investmentpln-ws-VGVdaFdgA2cDZwIx.docx

Original File Name: 1367B3.DOCX

Date and Time Comment Was Submitted: 2013-03-08 12:15:02

No Duplicates.

Comment 176 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jennifer
Last Name: West
Email Address: emeryvillewest@gmail.com
Affiliation: City of Emeryville, Council member

Subject: Support for Cap & Trade Proposal to increase public transportation funding
Comment:

March 8, 2013
Ms. Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento CA 95814

RE: Investment plan for cap-and-trade auction revenues

Dear Chair Nichols:

As a City Council member in Emeryville, transportation policy analyst and mother of two, I would like to express my strong support for the Sustainable Communities for All Proposal. I believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

I can see how critical public transportation is to the people of Emeryville. We are unusual in that our businesses and the city provide a free shuttle service to BART called Emery-Go-Round with 1.3 million riders per year. But it is not enough. People need better public infrastructure to make public transit the easy and convenient choice. We can do better.

I believe it is critical to build both homes and transit that are affordable and accessible to lower-income households, while supporting active transportation to improve health. Just this week, the Census Bureau named the San Francisco area the nation's "megacommuter" capitol – people who travel at least 50 miles and 90 minutes to work – with San Jose close behind. When people are priced out of homes near job centers and high-quality transit hubs, they must drive long distances to work.

According to a recent report by the California Housing Partnership Corporation, preserving and building affordable homes near transit will allow California to achieve the maximum VMT and GHG-reduction benefits of investment in transit infrastructure and transit-oriented development.

Sprawl and congestion are also bad for health - each additional hour spent in a car per day is associated with a 6 percent increase in the likelihood of obesity. Investing in safe bicycle and pedestrian infrastructure and programs like Safe Routes to School improves health in both urban and rural areas, and especially in

minority communities where pedestrians are significantly more likely to be killed by vehicles.

Investments like these will have the greatest impact on the communities most affected by climate change while also increasing access to opportunities.

Thank you for considering my comments,
Sincerely,
Jennifer West
Emeryville City Council member

Attachment: www.arb.ca.gov/lists/com-attach/202-2013investmentpln-ws-BWZTNAFyBTQAWQhk.docx

Original File Name: CARB letter March 8 2013.docx

Date and Time Comment Was Submitted: 2013-03-08 12:22:28

No Duplicates.

Comment 177 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Frank
Last Name: Landis
Email Address: franklandis03@yahoo.com
Affiliation: California Native Plant Society

Subject: Comments on the ARB Draft Investment Plan
Comment:

Dear Air Resources Board:

We appreciate the opportunity to comment on the Air Resources Board Cap and Trade Auction Proceeds Investment Plan Draft Concept Paper (Draft Investment Plan). The California Native Plant Society (CNPS) works to protect California's native plant heritage and preserve it for future generations. CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. We are writing to provide substantive comments on the Draft Investment Plan as it relates to natural resources and conservation.

We support better aligning the Draft Investment Plan with AB 1532's mandates relating to natural resources and conservation strategies as a mechanism to reduce emissions. The Draft Investment Plan mentions natural resources and conservation but does not utilize or identify appropriate tools that reduce greenhouse gas emissions through conservation and restoration of habitat lands. AB 1532 states that auction revenues shall be used to facilitate the achievement of reductions of greenhouse gas emissions in California. These funds shall be spent in a manner that maximizes economic, environmental, and public health benefits. The Act specifically states the greenhouse gas Reduction Fund shall appropriate funds towards one of several items, including the reduction of greenhouse gas emissions associated with water use and supply, land and natural resources conservation and management, forestry, and sustainable agriculture.

Unfortunately, not a single conservation strategy is outlined in the Draft Investment Plan to further this mandate. Please revise the Draft Investment Plan to include land conservation tools as a strategy for emissions reductions. Doing otherwise is shortsighted. There are numerous benefits and co-benefits associated with using land conservation as a means to reduce greenhouse gas emissions.

To pick one obvious example, California is home to some of the biggest trees in the world: redwoods, sequoias to name just a few. Why not invest in them? Why not invest in the over 7000 California native plant species that are adapted to every different habitat that the diverse state of California offers? It is so much cheaper than performing the research to find agricultural substitutes for this diversity. In many cases there are existing conservation

plans and programs that are supported at the local, regional, statewide and national levels by agencies, landowners and non-profit organizations that provide a suitable framework to achieve habitat conservation.

Plants naturally absorb carbon dioxide (CO_2) from the atmosphere and through photosynthesis it is stored as carbon. Plants release oxygen into the atmosphere as a by-product of this process. The carbon is stored (or sequestered) in the plants' tissues and up to 20% of the plants' total carbon intake ends up bound in the soil through root exudates. Our natural lands are capture and store carbon dioxide that would have otherwise been released into the atmosphere. When these lands are converted to more intensive uses, including agriculture, development, and even frequent fires, this carbon is rapidly lost back to the air, through soil disturbance, oxidation, and burning. Research has already been done in California supports this claims. East Bay Regional Parks District, for example, estimated the average amount of CO_2 sequestered annually by the District's 98,600 acres of protected natural lands to be 91,157 metric tons, the equivalent of removing 16,317 passenger cars from the roadways annually. (http://www.ebparks.org/ Assets/files/ebrpd_carbon_seq_study_2008.pdf, retrieved 1/16/2013). On a bigger scale, the National Science Foundation and U.S. Department of Energy commissioned a study that showed forests and other terrestrial ecosystems can sequester 40% of the nation's carbon emissions—up from the previous estimate of 30% (http://www.sciencedaily.com/releases/2011/04/ 110414131851.htm, Retrieved 1/16 2013).

Wildlands offer carbon avoidance benefits that would not have happened if the land was converted to more urban uses. Carbon avoidance offers manifold benefits. Preservation of land averts the release of stored (sequestered) carbon from vegetation and soil that otherwise would be released due to grading and land disturbance. The greenhouse gas impacts from construction are also avoided. Automotive emissions that would have come from vehicle miles traveled from residential and commercial uses are also avoided. This also ignores the other benefits that wildlands provide, such as trapping air pollutants, reducing noise, recharging groundwater, providing homes for sensitive species, and last but not least, providing cheap areas for recreation, education, and research.

Given that conservation managers are routinely underfunded and therefore extraordinarily efficient at leveraging funds to many purposes, any investment of cap and trade revenues in conservation issues will go much further than it would in the commercial sector. CNPS, for example, has partnered with agencies for years to provide low cost, high quality research and conservation activities throughout the state both with paid and volunteer staff, and we are just one of the many entities that work in the conservation sector.

We urge you to amend the Draft Investment Plan to incorporate conservation. It is productive, cost effective, and produces many benefits. Thank you for consideration of our comments.

Sincerely

Frank Landis, PhD
Conservation Chair

California Native Plant Society, San Diego Chapter

Attachment: www.arb.ca.gov/lists/com-attach/203-2013investmentpln-ws-UjFcNAFwWXkDdgVh.pdf

Original File Name: CNPSSD response to ARBInvestment Plan 20130308.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:30:35

No Duplicates.

Comment 178 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michael
Last Name: Bailey
Email Address: michaelebailey@cox.net
Affiliation:

Subject: CaP AND TRADE and support for public transport
Comment:

Dear Members of the Board:
I strongly support the view that CAP AND TRADE program funding should be apportioned in such manner that a portion of 30% or so go toward funding clean fuel transit in California's cities. Transit that is powered by clean fuels is a proven way to reduce smog and green house gases but providing for CNG, LNG, hydrogen fuel buses and solar power for terminals and bus stops and to create the hydrogen for bus power are expensive for transit agencies to do on their own and federal transit grants will be reduced. So funding for this work from the CAP AND TRADE program will be a huge help.

Thank you for your consideration of this important issue and best wishes, Michael E. Bailey.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 12:25:48

No Duplicates.

Comment 179 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Elizabeth
Last Name: Burton
Email Address: elizabethburton25@gmail.com
Affiliation:

Subject: cap and trade auction proceeds investment
Comment:

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Attached please find my suggestions on investing cap-and-trade
proceeds.
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Attachment: www.arb.ca.gov/lists/com-attach/205-2013investmentpln-ws-AGMFYgNyUFwHYFU7.pdf

Original File Name: Cap and trade auction proceeds comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:24:01

No Duplicates.

Comment 180 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeanne
Last Name: Merrill
Email Address: jmerrill@calclimateag.org
Affiliation: California Climate & Agriculture Network

Subject: Cap-and-trade investments in agriculture
Comment:

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Attached please find a letter signed by 40 agricultural,
environmental and land conservation organizations, businesses and
farmers describing investment opportunities in California
agricultural conservation.

Thank you for your consideration.
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Attachment: www.arb.ca.gov/lists/com-attach/206-2013investmentpln-ws-AWhROVIlVGJWIwB0.pdf

Original File Name: Investments in agriculture .pdf

Date and Time Comment Was Submitted: 2013-03-08 12:33:21

No Duplicates.

Comment 181 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Doug
Last Name: Johnson
Email Address: dwjohnson@cal-ipc.org
Affiliation: California Invasive Plant Council

Subject: Managing invasive plants to reduce GHG emissions
Comment:

On behalf of the California Invasive Plant Council (Cal-IPC), I am writing to propose the use of cap-and-trade auction proceeds for invasive plant management in California's lands and waters. Invasive plant management can reduce greenhouse gas (GHG) emissions while also realizing other environmental benefits. State funding for invasive plant management has been cut in recent years, and funding from auction proceeds would help renew these important programs.

Please see our attached comments. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/207-2013investmentpln-ws-WjkHYF0wUS8DbABw.pdf

Original File Name: Cal-IPC Cap-and-trade comments to ARB.2013.03.07.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:37:10

No Duplicates.

Comment 182 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Alex
Last Name: Keros
Email Address: alexander.keros@gm.com
Affiliation: General Motors

Subject: General Motors' Considerations on the Draft Cap & Trade Investment Plan
Comment:

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Please see the attached comments from GM on the Draft Cap & Trade
Auction Proceeds Investment Plan (Draft Concept Paper).

Thank you,

Alex Keros
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Attachment: www.arb.ca.gov/lists/com-attach/208-2013investmentpln-ws-VzAAa10DAzNXPgJv.pdf

Original File Name: GM Comments on C&T InvestPlanDraft_Final.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:34:31

No Duplicates.

Comment 183 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Craig
Last Name: Breon
Email Address: craig@sierranevadaalliance.org
Affiliation: Sierra Nevada Alliance

Subject: Comments on Investment Plan for Auction Proceeds
Comment:

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Please see attached file.  If you can acknowledge receipt of this
comment, I would appreciate it.
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Attachment: www.arb.ca.gov/lists/com-attach/209-2013investmentpln-ws-VzRcO1IjVFgGYQFv.pdf

Original File Name: Cap and Trade Investment Comments_Sierra Nevada Alliance.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:36:27

No Duplicates.

Comment 184 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Craig
Last Name: Breon
Email Address: craig@sierranevadaalliance.org
Affiliation: Sierra Nevada Alliance

Subject: Comments on Investment Plan for Auction Proceeds
Comment:

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Please see attached file.  If you can acknowledge receipt of this
comment, I would appreciate it.
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Attachment: www.arb.ca.gov/lists/com-attach/210-2013investmentpln-ws-AGNTNAFwWVUAZwFv.pdf

Original File Name: Cap and Trade Investment Comments_Sierra Nevada Alliance.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:36:27

No Duplicates.

Comment 185 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dean
Last Name: Toji
Email Address: Dean.Toji@csulb.edu
Affiliation:

Subject: Affordable Housing is needed for success of SB 535 implementation
Comment:

Dean S. Toji, Ph.D.
Affiliations: Little Tokyo Service Center, member, Board of Directors. Asian Pacific Policy and Planning Council, Environmental Justice Task Force, committee chair (EJTF purpose: To increase Asian American and Pacific Islander engagement with global warming & other environmental issues). EJTF is a member of the 535 Coalition and endorses its Principles.

I will focus on the implementation of SB535 and the need for the investment program to secure plentiful and permanently affordable housing.

There is a problem that needs to be addressed. SB535 directs programs to be located in, or to benefit, "disadvantaged communities." These communities have been operationalized as places (zip codes) selected for the demographics and exposures of their current populations.

The SB535 programs that will go to these places will bring many improvements, such as: good public transportation, energy efficient buildings and clean energy generated on-site or nearby, and urban forests & parks. There will be: cleaner air, shade, walkability. The neighborhoods will look good. Which will attract new retail, services, offices, jobs, & other amenities. They'll be nice places to live.

They will also be magnets for gentrification: More affluent residents move in. Rents will go up. Buildings that have low rents now will be torn down and replaced.

Low income residents will be forced out. The zip codes will have gotten the benefits, but not the communities that once lived there.

Could this actually happen? It is happening now around fixed rail transit oriented development. We've seen it happen before with redevelopment, which destroyed neighborhoods and evicted thousands of low income residents in California. It took major conflicts to bring about the reforms that added affordable housing as a requirement for redevelopment projects.

In order to meet the goals SB535:

1. The investment programs have to generate LOTS of affordable housing. I'm sure you have received other comments on the need to

have large amount of affordable near transit in order to effectively reduce net greenhouse gas emissions. The extreme social need that could be addressed by the increase of affordable housing is a profound co-benefit.

2. The housing must be PERMANENTLY affordable, especially because the market forces generated by the new infrastructure will always threaten displacement. The investment programs should fund the non-profits that build, own and operate affordable housing. They are dedicated to that purpose, and won't flip the housing for profit.

3. We also need to PRESERVE EXISTING affordable housing. For example, thousands of units in the Los Angeles area are in danger because the affordability agreements that came with the subsidies are expiring. The funding programs can and should be targeted to save such housing near transit and in the 535-designated areas.

In summary:
If the investment program does not secure affordable housing it would defeat the purpose of SB535.
In order for the implementation of SB535 to actually benefit disadvantaged communities, the investment program must secure affordable housing, lots of it, and permanently.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 12:40:42

No Duplicates.

Comment 186 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mandy
Last Name: Parkes
Email Address: mparkes@iercd.org
Affiliation: Inland Empire RCD

Subject: Revenue Allocation from Cap-And-Trade Program
Comment:

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Please see the attached letter regarding recommendations for AB 32
revenues.

-Mandy Parkes, District Manager
Inland Empire RCD
909-799-7407 x106
mparkes@iercd.org
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Attachment: www.arb.ca.gov/lists/com-attach/212-2013investmentpln-ws-VD0HZFckAjIHZQlW.pdf

Original File Name: IERCD ARB Rec Letter 3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:31:17

No Duplicates.

Comment 187 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Chris
Last Name: Simmons
Email Address: chris.simmons@vride.com
Affiliation: vRide, Inc.

Subject: Investment Plan Input
Comment:

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See attached file
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Attachment: www.arb.ca.gov/lists/com-attach/213-2013investmentpln-ws-VjUGYVQnV2YLUlc2.pdf

Original File Name: CARB as submitted.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:46:31

No Duplicates.

Comment 188 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Suzanne
Last Name: Smith
Email Address: suzsmith@sctainfo.org
Affiliation: Sonoma County Transportation Authority

Subject: SCTA/RCPA comments on Draft Concept Paper
Comment:

On behalf of the Board of Directors of the Sonoma County Transportation Authority (SCTA) and Regional Climate Protection Authority (RCPA), I am writing to provide comments on the Cap-and-Trade Auction Proceeds Investment Plan Draft Concept Paper and express support for integrated, local investments in sustainable communities.

The RCPA was created to provide coordination on local efforts to address energy efficiency, transportation, renewable energy, resiliency strategies, and long-term planning among the County of Sonoma, all nine cities, and other public agencies in Sonoma County. The RCPA is overseen by the same board as the SCTA, allowing us to leverage existing transportation planning capacity and maximize the effectiveness of local greenhouse gas reduction programs.

We believe that local governments and regional collaboration on emissions reduction programs have important roles to play in achieving the state's GHG reduction targets. Achievements in Sonoma County are evidence of the capacity that local actors have to implement innovative and aggressive programs that achieve demonstrable GHG reductions:

• Sonoma County and all its nine cities – in conjunction with the local non-profit Climate Protection Campaign – adopted a community target to reduce emissions to 25% below 1990 levels by 2015.
• The Sonoma County Water Agency - the single largest energy user in the County - adopted a goal to be Carbon Free by 2015 and via renewable energy and energy efficiency projects has reduced emissions by 97% since adopting this goal.
• The County has established the Sonoma County Energy Independence Program (SCEIP), a PACE program that has financed more than 1,800 projects totaling nearly $60 million in improvements.
• The County recently approved the formation of the joint powers authority for Sonoma Clean Power, a Community Choice Aggregation program.
• The RCPA has led efforts in implementing energy efficiency, renewable energy, and climate action programs, ensuring that both small and large governments can engage in GHG reduction efforts in a meaningful way and harness efficiencies by collaboration at a regional scale.

• The RCPA has established innovative programs such as the Windsor Pay As You Save (PAYS®) on-water-bill financing program that allows

residents to address water and energy costs at very low-risk and the Energy Upgrade California Flex Path which aims to transform the market for whole-home retrofits.
• The SCTA has led the way with innovative transportation programs such as WeGo Sonoma, a real-time ridesharing program that links riders and drivers to reduce single occupant vehicle use.

These projects have created multiple benefits for our communities: GHG reductions, cleaner air, reduced energy, water, and transportation costs, improved public health, and local jobs. However there is much more work to be done in Sonoma County and at a local level throughout California.

Therefore, we strongly believe that a portion of cap-and-trade revenues should be dedicated to a local government emissions reduction program that will enable regional and local agencies to deliver the kinds of projects that will be needed for the state to meet its goals, including energy efficiency, water efficiency, distributed generation, conservation, urban forestry, and other natural resource investments.

We also believe that auction proceeds derived from transportation fuels should be allocated to transportation projects that reduce GHGs while addressing critical transportation system needs, which is why we signed a letter in support of the Transportation Coalition for Livable Communities proposal. We strongly support their call for flexibility in allowing local agencies to develop the most-cost effective projects to meet critical transportation infrastructure and maintenance needs and achieve their greenhouse gas reduction goals in a manner consistent with regional Sustainable Communities Strategies.

In closing, we would like to highlight several aspects of the concept paper that we urge you to further develop and consider specifically when crafting the final Investment Plan:

1. Integrated solutions to transportation emissions that address mobility, infrastructure, and land-use create multiple co-benefits to our communities while addressing the largest contributor to GHGs (pages 10 and 15)
2. Financing and on-bill repayment are essential tools for driving commercial and residential energy and water efficiency projects and renewable energy projects (page 10)
3. Nearly all of the near-term strategies called out in Figure 9: Examples of Potential Projects for Investment through 2020 can be implemented at a local government level (page 12)
4. “Funding should leverage private and other government investment to the maximum extent possible”; existing local government emissions reduction programs and regional SCS planning processes provide excellent vehicles to leverage other investment. (page 15)

Thank you for consideration of our comments.

Sincerely,
Suzanne Smith
Executive Director, SCTA/RCPA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 12:53:03

No Duplicates.

Comment 189 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Lee
Last Name: Kindberg
Email Address: Lee.Kindberg@maersk.com
Affiliation: Maersk Line

Subject: Support for Santa Barbara County Air Pollution Control District Proposal
Comment:

Maersk Line is pleased to express support for the proposal by the Santa Barbara County Air Pollution Control District to establish a Vessel Speed Reduction incentive program using cap-and-trade auction funds. Vessel speeds have very significant impacts on vessel fuel consumption and the resulting emissions.

I first met with the District and other stakeholders in Santa Barbara in February 2012 to share information from the shipping industry perspective and learn more about their concerns on greenhouse gas emissions, criteria pollutants and protecting whales. Since then I have spoken with District staff several times to assist them in development of a workable program. We will continue to work with the District to provide insights and input as this program develops, and anticipate participating.

A letter of support is attached.

Attachment: www.arb.ca.gov/lists/com-attach/215-2013investmentpln-ws-AWxdOlQwACEEcQds.pdf

Original File Name: Maersk Line Comments to CARB on SBCAPCD proposal.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:50:05

No Duplicates.

Comment 190 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Sean
Last Name: Hastings
Email Address: sean.hastings@Noaa.gov
Affiliation: Channel Islands Marine Sanctuary

Subject: Support for a Ocean Vessel Speed Reduction Incentive Program
Comment:

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Please see the attached.  Thank you.  Sean
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Attachment: www.arb.ca.gov/lists/com-attach/216-2013investmentpln-ws-AW9XPlY2WWtWDwRy.pdf

Original File Name: NOAA_Vessel_Speed_Reduction_Initiative_support.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:54:28

No Duplicates.

Comment 191 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Gabrielle
Last Name: Weeks
Email Address: Gabrielle@workwithweeks.com
Affiliation: Long Beach Coalition for a Safe Env.

Subject: Please use proceeds for zero emissions transportation
Comment:

On behalf of the Long Beach Coalition for a Safe Environment, I urge the CA Air Resources Board to significantly invest proceeds for the Cap & Trade auction in systems that move goods and people without the need to combust fuel.

Particularly in car-addicted California, millions of cars and trucks moving cargo and people contribute the largest share to our total GHG emissions. Providing incentives and capital to invest in systems that can move people and their stuff with no emissions can make a huge dent in this problem.

This isn't just about electric cars and charging infrastructure, which are poised to make a huge jump in the marketplace. It is also about convenient mass transit, ease of using bicycles or walking for short trips, and switching our train systems to employ electricity instead of fuel.

Electrifying our railway and ports seems to be a low hanging fruit - ports and rail lines are established and stationary, it is purely a matter of capital investment to make the switch. The impact to GHG reduction would be enormous, as just from the Ports of L.A. and Long Beach near me, 44% of the Nation's cargo is handled.

My organization has endorsed the GRID project, which provides an example of the scope of benefits we could see if we addressed the issue of climate change on the scale needed to really make an impact. I hope you will place a lot of emphasis on similar projects and initiatives that will make a dent in our GHG emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 12:43:03

No Duplicates.

Comment 192 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tim
Last Name: O'Connell
Email Address: TOConnell@CenturyHousing.org
Affiliation: Century Housing

Subject: Cap and Trade Revenue Investment Options
Comment:

```
Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/218-2013investmentpln-ws-BjRTZQAwWTlVfgk5.docx

Original File Name: 2013-03-08 ARB Cap and Trade.docx

Date and Time Comment Was Submitted: 2013-03-08 12:37:40

No Duplicates.

Comment 193 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Daniel
Last Name: Krause
Email Address: daniel.krause@ca4hsr.org
Affiliation: Californians For High Speed Rail

Subject: Comment Letter regarding Cap-and-Trade Investments
Comment:

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Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/219-2013investmentpln-ws-VTZQN1VgU2gGcwl7.pdf

Original File Name: CA4HSR Comment Ltr Re Cap N Trade Investments.pdf

Date and Time Comment Was Submitted: 2013-03-08 12:58:03

No Duplicates.

Comment 194 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jim
Last Name: Branham
Email Address: jbranham@sierranevada.ca.gov
Affiliation: Sierra Nevada Conservancy

Subject: Draft Concept Paper on Investment Plan for Cap-and-Trade Auction Revenues
Comment:

Thank you for this opportunity to provide comments on the Air Resources Board's Draft Concept Paper (2/15/13) on proposed investment of cap-and-trade auction proceeds.

As you well know, the Sierra Nevada Conservancy (SNC) is a California state agency within the Natural Resources Agency, created by bi-partisan legislation and signed into law in 2004. The SNC Region constitutes about 25 percent of California's land area and is the source of much of the state's timber yield and over 60 percent of California's developed water supply, serving end users throughout the State.

Based on the importance of the Region in meeting the state's greenhouse gas (GHG) emission reduction goals under Assembly Bill (AB) 32, we urge the Air Resources Board to consider the following additions to the first three-year investment plan for cap-and-trade auction revenue.

Forest Sector Investment

Almost a third of California (31 million acres) is forested. These forests present the safest, most expandable method for actually removing CO2 from the atmosphere and storing it safely in trees. California's forest sector is specifically identified in the AB 32 Scoping Plan as a means of achieving GHG emission reduction goals through:

• Forest conservation (to maintain existing carbon storage and reduce conversion to more pollution-emitting uses);
• Forest stand improvement (to improve forest health and increase the amount of carbon that can be stored in existing forests);
• Reforestation and afforestation;
• Urban forestry; and
• Fuels management (to make existing forests more resilient and reduce the risk of GHG-emitting wildfire).

The forest sector is also called out in AB 1532, which specifies using cap-and-trade auction revenues for forestry and other natural resource management and conservation [Health and Safety Code §39712(c)(3)]. AB 1532 further states that auction revenues should be used to achieve specific co-benefits, such as: fostering job creation; improving air quality; providing opportunities for businesses, public agencies, nonprofits and other groups to participate in and benefit from the state's GHG reduction efforts; and lessening the impacts of climate change on the state's

communities, economy and environment.

Investing auction revenue to improve forest condition not only leads to direct GHG reductions, but it also ensures a long-term carbon bank; improves air quality by reducing catastrophic wildfire and open pile burning; provides opportunities to local forest contracts and businesses that can use the wood waste for energy or higher value products; provides an incentive for federal, state and local land managers to coordinate land management to make strategic investments in hire fire risk areas; protects water quality and reliability at the source for 23 million Californians; sustains fish and wildlife habitat; supports recreational uses in our forest lands; reduces threat of wildfire to life and property; supports rural forest economies by creating forestry-related jobs; produces local renewable energy; and, supplies a sustainable source of lumber and other forest products that continue to sequester carbon throughout their useful life.

Recommendation: Include low-risk, high-return forest sector investment in the first investment plan, administered through entities like CalFIRE, state conservancies with forested lands Resource Conservation Districts, and other entities with existing programs, to begin achieving direct GHG emission reduction benefits while supporting DAC investment and multiple co-benefits.

Investment in Bioenergy Production

Investment in forest restoration provides the opportunity for renewable energy development through the use of forest waste, or “biomass,” to produce energy. Converting forest waste to energy by burning it in a controlled biomass energy facility achieves air quality benefits on two levels: 1) it keeps that waste from being disposed of by open pile burning, and 2) the forest treatments that produce the biomass reduce the risk of large, damaging wildfires that also emit substantial GHG. Use of biomass for energy also displaces the burning of fossil fuels, which add GHG to the atmosphere, and provides reliable power when other renewable sources, such as wind and solar, may be offline.

Investment must be directed to all forest lands, regardless of jurisdiction, in order to get the full benefit from the sector. The 20 million acres of national forest system lands represent a huge opportunity to reduce fire risk and protect and increase carbon stores in the state.

Recommendation: Allow cap-and-trade auction revenue to be spent on public forest land to achieve critical air quality and renewable energy benefits.

Forest Conservation

Conservation of forests threatened by conversion or degradation is a key action that prevents emissions associated with loss of forest stocks while also securing additional carbon sequestration into the future. Protecting and enhancing California’s forest carbon banks can be achieved through either conservation easements or fee title purchase.

Conservation easements allow the state or qualified land trusts to collaborate with interested landowners to develop site-specific guidelines for enhancing forest resource values, including increased carbon storage, while keeping the property in private

ownership and management. Fee title acquisition allows the state or non-profit partner to directly manage strategically important threatened forest for the public good when such conservation cannot be achieved in a public-private partnership. Both approaches can facilitate increased public access and recreation.

Additional co-benefits of forest conservation include:

• Improved forest management for climate and habitat benefits, including site-specific conservation prescriptions and support for adaptation;
• Watershed conservation to maintain water quality and reliability at the source; and
• Prevention of sprawling land use patterns that lead to auto-dependency, increased CO_2 emissions and resource inefficiencies.

Recommendation: Include forest conservation investment in the first investment plan, to be implemented through the Wildlife Conservation Board, state conservancies with forested lands, CalFIRE and other entities with existing programs in place, to begin achieving long-term carbon storage, emission reduction, climate change adaptation, water reliability and local economic benefits.

DAC Identification and Mapping

It is clear that the areas identified by the CalEnviroScreen tool are disadvantaged; but right now the determination criteria fail to recognize any communities in the rural forested parts of the state – some of the areas hardest hit by the economic downturn. The criteria and formula should not exclude many rural communities that are disproportionately affected – the ones that are suffering from environmental pollution and socio-economic ills like declining personal income, accelerated unemployment, low educational attainment levels and growing numbers of children living in poverty.

The DAC definition, for purposes of investment of cap-and-trade auction revenue, should be further examined and amended so that vulnerable communities in the rural forested areas are also recognized and eligible for cap-and-trade funding. All Californians will bear the cost of reaching the state's GHG emission reduction goals; therefore, the benefits that accrue from those efforts should apply more broadly.

Recommendation: Use the Rural Community Focus Group – a diverse group of experts who understand disadvantaged communities of all types being convened by the Governor's Office of Planning and Research – to refine the definition of DAC so it does not exclude rural forested communities.

Conclusion

Early investment of cap-and-trade auction revenue in forest sector projects, including on public lands and in disadvantaged communities in the rural forested areas, would fulfill the letter and the spirit of the AB 32 implementation laws that call for a) reducing GHG emissions in both the short- and long-term, b) maximizing additional environmental, economic and public health benefits ("co-benefits") for California and c) directing investment toward disadvantaged communities and households across the state.

Thank you for the opportunity to contribute to discussions regarding these important issues.

Attachment: www.arb.ca.gov/lists/com-attach/220-2013investmentpln-ws-VCcGaQRgWHlVIQhp.pdf

Original File Name: SierraNevadaConservancy-CTAuctionComments.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:06:47

No Duplicates.

Comment 195 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Daniel
Last Name: Yost
Email Address: dyost@orrick.com
Affiliation: Orrick (opinions expressed are my own)

Subject: Green Prize for Clean Tech Innovation
Comment:

I am pleased to submit the attached editorial which was published in the San Jose Mercury News in February 2013 proposing the use of some of the AB 32 revenues for an annual series of California Green Prizes to incentivize clean technology innovation and job creation in California. The editorial (which contains a list of early supporters and promoters at the end) can also be viewed here:

http://www.mercurynews.com/opinion/ci_22582291/daniel-yost-use-california-cap-and-trade-funds

The list of supporters and promoters has grown since this was first published. For example the Clean Tech Open has expressed great support of the idea (and a desire to help administer it) and the California League of Conservation Voters has distributed the attached editorial to all members of the CA Senate and Assembly. In addition I would like to include some additional comments below in responses to questions that I have received about the Green Prize proposal.

1. Is this a legal use of the AB 32 Revenues? Is there a nexus between clean technology developments and greenhouse gas reduction?
Yes! AB 1532, expressly allows funds from the Greenhouse Gas Reduction Fund to be used for, among other things, "Funding in research, development, and deployment of innovative technologies, measures, and practices related to programs and projects funded pursuant to this part." Health & Safety Code Section 39712(c)(7). In addition the metrics developed for awarding Green Prizes can be expressly tied to greenhouse gas reduction or other relevant metrics that would achieve that aim.
2. Should we leave technology prizes to the private sector or private “do-gooder types?
I am all in favor of private donors doing more but in reality both the federal government (with the end of the stimulus money) and the private sector (VCs are focused on the Internet and mobile) are reducing dollars in this area. This makes state innovation funding more critical than ever. In terms of a private “do-gooder type” I am all in favor of one stepping up, but I don’t see that happening at the moment (education and health seem to be trendier at the moment among the tech multi millionaire set). One idea on this front might be for the state to use some of its allowance money for a Green Prize with a matching opportunity for some of the prizes to ensure private sector involvement -- although the whole goal of the

Green Prize is to have the private sector open its wallets and do the research the state wants.

Historically speaking, if you look at most of the great inventions (the Internet and most every source of energy from coal (subsidized in the 19th century) to nuclear to solar) there has been some form of government support – at least in the early years.

California's high profile will likely cause greater investment than a "private prize" will. The state has the advantage of the bully pulpit and can keep something in the news more effectively than if a millionaire or a non-profit was to do this on their own.

Finally, putting aside what the private sector could (and should!) do, the AB 32 money is there and needs to be spent on activities related to climate change. I genuinely believe that part of the analysis should be – where do you get the biggest bang (climate improvement) for the buck. In my view, the greatest return on investment comes from a Green Prize that can expire in a few years so that CA either gets (i) its "dream inventions" or (ii) its money is retained to spend on other (climate related) things.

3. Will this help Disadvantaged Communities?

The state can shape the Green Prize to help disadvantaged communities. CA can identify technology that the state wants to buy or that it thinks meets other state objectives. Take an example – local air quality clean up technology (i.e. removal of pollutants from ambient air in a specific location). This is something that the state could set guidelines for what it wants to see with the goal of cleaning up the air in the Central Valley or in disadvantaged communities. California can create a Green Prize covering low cost technology that California would most like to see available for purchase and use within disadvantaged communities based on the needs of disadvantaged communities around the State.

4. What types of innovations could a Green Prize Support?

A well designed California Green Prize could provide the inspiration for groundbreaking, scalable, cost-effective advances in: artificial photosynthesis, energy storage, fusion, technology to remove carbon or methane from the atmosphere, reducing climate impacts of specific industries (i.e. aviation and trucking), technologies to remove or replace non-carbon greenhouse gases, environmentally sound desalinization (to mitigate the loss of freshwater in California from a reduced snowpack), tidal energy capture, technologies to bring low cost climate friendly energy to disadvantaged communities or other areas where a break-through is sorely needed to reverse, limit or mitigate climate change.

5. Will this help with job creation?

Yes! The Bay Area Council estimates that for every job created in the tech sector that 4.3 jobs are eventually created in the local goods and services economy. Tesla doesn't just employ high paid engineers but factory workers and mechanics too. California could require in its Green Prize rules that some technology development of the product must occur within California to qualify for the Green Prize award.

6. Why support "innovation" rather than something more "tangible" like building retrofits, etc.?

I do think that if thoughtful metrics are used for what types of innovations will result in the prize then tangible metrics could be relatively straightforward to determine based upon that. For example (i) carbon sequestration = straightforward to measure GHG reduction; (ii) artificial photosynthesis = compare to alternative sources of energy; (iii) dramatically increased battery storage = probably a little tougher to measure but still a clear benefit and measurements exist to show GHG savings attributable to this.

I don't believe that all the money should go towards innovation. But 1-5% does seem like a reasonable (even low) investment --

especially if we get some of it back if the innovations are not created.

7. Do existing programs of grants like EPIC address this issue? EPIC is a good program and provides for limited GHG reduction R&D. It should continue to be supported. Nothing here is intended to take away from that, however EPIC is not very much money in the scheme of things. The Green Prize is a longer term investment in big GHG-reducing technologies. The state could formulate the prize in any one of a number different ways and, in fact, there should be many prizes over time. California is a leader on climate policy for the US, and must also be a technology leader, demonstrating that more substantial technology development is possible.

A prize for big GHG-reducing technologies will motivate entrepreneurship and redirect companies into new business areas much faster that EPIC R&D and at a very low cost to the state. Funding a Prize from AB 32 revenue helps to solve the "R&D Financing Gaps" that has been raised in a number of other comments submitted online through the ARB website.

Based on my experience working with entrepreneurs: there are many that have little interest in applying for a grant; however if you set up a competition with a prize – that will get their juices flowing. I don’t know if this is human nature or a reflection of the types of people that are attracted to high growth technology companies but it is certainly something I have observed.

8. It’s a good idea but there are allot of good ideas out there. Why should California support this idea?

a) Current technology is not adequate to solve our climate crisis so increased spending on clean technology innovation is needed to produce game changing technologies;

b) the prize should be awarded to only large GHG-reduction technologies that would create “game changers” like the creation of the aviation industry (Lindenbergh’s prize) or commercial spaceflight (the Ansari X Prize), since the rest of the AB 32 funds will go towards more incremental GHG reductions;

c) a Green Prize will use only a small fraction of the proceeds (and leverages private funds) and, therefore, will not take away from other CA priorities; and

d) A Green Prize can be targeted to help with job creation and assistance to disadvantaged communities.

The "cap" part of cap-and-trade is what is going to drive down GHG to 1990 levels by 2020. Industry will spend money on credits, and when those become more expensive, then on GHG reducing actions. What will be needed are new technologies to reduce GHG in big ways. The private sector is not going to make those R&D investments without an incentive. As noted in the attached editorial, the technologies do not currently exit to meet the State’s 2050 goals. A Green Prize will create that incentive!

Daniel Yost: Use California cap-and-trade funds for Green Prize to reward climate-change innovation

Special to the Mercury News

February 13, 2013

California has a unique opportunity to use competition to combat climate change and generate jobs and innovation. By leveraging a very modest share of revenue from California's new cap-and-trade program to award an annual Green Prize, California can motivate and inspire innovators to leverage their intellectual and financial capital to solve our climate change crisis.

There is a pool of money available for reducing or mitigating climate change generated from the sale of pollution "allowances" under AB 32, California's cap-and-trade program that went into effect last fall. According to Gov. Jerry Brown's recent proposed budget and an analysis by the Legislative Analyst's Office, the pool will be in the hundreds of millions of dollars this fiscal year and multiple billions over coming years. From that pool, California should set aside one or more buckets of $10 million a year for an annual Green Prize for innovators who are first to achieve some specific groundbreaking technology that meets thoughtfully established, published criteria.

Prizes designed to facilitate technological breakthroughs have a proven track record. The Orteig Prize inspired Charles Lindbergh in 1927 to be the first to fly nonstop from New York to Paris. The $10 million Ansari X Prize was awarded to Paul Allen's team in 2004 for the creation of a privately financed spacecraft, and the contest generated more than $100 million in private investment in spacecraft innovation. Both prizes launched new industries.

California could run this Green Prize through the Air Resources Board or partner with outside experts such as California-based Cleantech Open or the X Prize Foundation, each of which has worked with other government agencies (including the U.S. Department of Energy and NASA) to manage similar competitions. A panel of experts can recommend high-impact breakthrough technologies currently in their infancy and identify criteria to justify the award of a Green Prize, including milestones related to demonstration of an effective prototype or readiness for widespread adoption.

To accelerate innovation and ensure the money is spent as intended, if the prize criteria are not met within three years of the announcement of a particular Green Prize, it should expire, and the prize money should be applied to a new Green Prize or repurposed for more conventional climate change mitigation efforts. The prize expiration creates a no-lose opportunity for California. Either a high-impact innovation is created, or the money is returned to the climate change revenue pot.

Private investment in clean technology has dropped, just as the impacts of climate change are becoming more apparent. Deployment of existing technology is not enough for California to reach its legally mandated goal of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050, according to a 2011 report by the California Council on Science and Technology. Achieving that aim will require "intensive and sustained investment in new technologies," the study concluded. A Green Prize where a desired innovation is created or the prize money is recycled by the state creates a win-win opportunity for California.

State Sen. Jerry Hill, D-San Mateo, has said that the Green Prize "would create an investment in our future." Assemblyman Rich Gordon, D-Menlo Park, has stated that the idea "captures California's spirit." Assemblyman Kevin Mullin, D-San Mateo, finds it a "great way to incentivize action to solve the complex problem of climate change." Assemblyman Paul Fong, D-Cupertino, called this a "great idea." San Francisco Board of Supervisors President David

Chiu, Joint Venture Silicon Valley and Environmental Entrepreneurs have all endorsed this idea. Let the contest begin!
Daniel Yost works with entrepreneurs as a technology lawyer in the Silicon Valley office of Orrick, Herrington & Sutcliffe LLP. He wrote this for this newspaper.

Attachment: www.arb.ca.gov/lists/com-attach/221-2013investmentpln-ws-AmZTNFU6UmgBYgRo.docx

Original File Name: Daniel Yost ARB Comments.docx

Date and Time Comment Was Submitted: 2013-03-08 13:10:55

No Duplicates.

Comment 196 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jackelyn
Last Name: Cornejo
Email Address: jcornejo@laane.org
Affiliation: Los Angeles Alliance for a New Economy

Subject: Cap and Trade Investment Plan Comment Letter (LAANE)
Comment:

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Dear Chairperson Nichols and Board,

Attached you will find written comment regarding the Cap and Trade
Investment Plan on behalf of the Los Angeles Alliance for a New
Economy (LAANE)

Sincerely,

Jackelyn Cornejo, Project Director
LAANE
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Attachment: www.arb.ca.gov/lists/com-attach/222-2013investmentpln-ws-VDcGYVQlV1tSNQRq.pdf

Original File Name: Cap and Trade Fund Comment Letter (3.8.12).pdf

Date and Time Comment Was Submitted: 2013-03-08 12:59:04

No Duplicates.

Comment 197 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Susan
Last Name: Riggs Tinksy
Email Address: susan@housingsandiego.org
Affiliation: San Diego Housing Federation

Subject: Investment Plan for Cap and Trade Auction Revenues
Comment:

On behalf of the San Diego Housing Federation, we appreciate the opportunity to comment on the draft concept paper for the Cap and Trade Auction Proceeds Investment Plan. Founded in 1990, the San Diego Housing Federation is a non-profit organization that advocates for the creation and preservation of affordable homes in the San Diego region.

The San Diego Housing Federation is one of more than 50 organizations statewide that have signed on to the Sustainable Communities for All proposal. The principals set forth in the proposal seek to align the expenditure of Cap and Trade revenues with the goals set forth in AB 32 and SB 375 by providing equitable transportation and housing choices that allow all Californians to drive less and reduce household costs, especially for low-income households.

Of particular importance, the proposal would authorize a portion of the Cap and Trade revenues to be used to create affordable homes that promote the use of public transit and utilize energy efficiency and sustainable energy resources. The availability of housing available to California's workforce and in proximity to transit choices is key to reducing emissions resulting from the use of single passenger vehicles, a major contributor of GHG emissions.

A recent study of the relationship between affordable housing and transit oriented development conservatively estimated the reduction of vehicle miles traveled and GHG emissions at 4% reduction per affordable unit based upon higher transit usage and lower rates of car ownership. However, it is widely believed that the impact is much greater. For example, according to the City of San Diego's 2011 Affordable Housing Parking Study, parking utilization rates in affordable housing communities are "about half of that of the typical rental units in San Diego; almost half the units surveyed had no vehicle." As a result of these findings, we believe that the funding relationship between transit development and affordable housing can significantly expedite the state's goals of improving air quality.

We believe that by including affordable homes in Cap and Trade auction revenues investment strategies, California can make great strides in reaching greenhouse gas emissions reduction goals and ensuring that these funds are invested equitably throughout our communities. A cap-and-trade revenue investment plan that includes funding for transit-oriented affordable housing will have the

greatest impact on the communities most impacted by climate change and will offer numerous co-benefits. We encourage you to support the principals set forth in the Sustainable Communities for All proposal by including them in the Cap and Trade Investment Plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 13:21:19

No Duplicates.

Comment 198 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 199 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Adina
Last Name: Levin
Email Address: alevin@alevin.com
Affiliation: Friends of Caltrain

Subject: Investment plan for cap-and-trade auction revenues
Comment:

As an advocate for public transit and land uses that support transit and active transportation, I would like to express my strong support for the Sustainable Communities for All Proposal.

I believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less.

In order to achieve the goals of SB 375, Californians need to have transit choices that are reliable, frequent, and well-connected. We need to have options for housing in compact, mixed use neighborhoods that allow many of our transportation needs to be met without driving. We need safe, connected networks for walking and biking. And these choices need to be available at all income levels for social equity and public health.

Thank you for considering these investment priorities to achieve the state's goals for SB 374.

Sincerely,

Adina Levin
Co-Founder
Friend of Caltrain

Ryan Wiggins, TransForm rwiggins@transformca.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 13:18:57

No Duplicates.

Comment 200 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Larry
Last Name: Greene
Email Address: lgreene@airquality.org
Affiliation: SMAQMD

Subject: 2013 Investment Plan
Comment:

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Dear Chairman Nichols,

Thank you for the opportunity to comment on the 2013 Cap-and-Trade
Auction Proceeds Investment Plan. Please see the attached comment
letter from the Sacramento Air Quality Management District.

Sincerely,
Larry Greene
Executive Director/ Air Pollution Control Officer
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Attachment: www.arb.ca.gov/lists/com-attach/226-2013investmentpln-ws-UyACaVc3AiAKYVA0.pdf

Original File Name: SMAQMD_CommentLetter.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:22:35

No Duplicates.

Comment 201 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jason
Last Name: Herring
Email Address: jaherring@usa.net
Affiliation:

Subject: Direct CAT funds to greening our Port through GRID
Comment:

Dear Sir or Madam:

A major source of carbon emissions in Los Angeles is the multimodal diesel traffic surrounding cargo handling at California's twin ports of Los Angeles/Long Beach. The current method of reducing carbon footprint at the ports has been to make incremental improvements while operations continue business-as-usual. We can do better.

Rather than small measures such as 'newer diesel trucks' and a long-haul rail yard which is 'closer' (the proposed Southern California International Gateway) but still requires the same complicated multimodal steps to unload container traffic as before (ship->crane->local cargo mover->storage yard->tractor-trailer truck->rail yard->train) the technology and even a complete project to move containers directly to electric rail exists.

I urge you to review the GRID project at:
http://gridlogisticsinc.com/

Implementation of GRID would represent a quantum leap in the efficiency of cargo handling while radically reducing greenhouse gas emissions, elimination of the need for expensive, unhealthy and intrusive freeway expansion projects (read: 710 freeway widening project) and create thousands of good jobs. This would also free up hundreds of acres of valuable portside real estate for other more productive uses than container parking lots.

GRID meets or exceeds the goals and requirements of AB32, AB1532, SB375 and SB535 while keeping California's largest ports well ahead of competition from Mexico and U.S. East Coast facilities, thus securing our place as "America's Port" well into the future. It also lays the foundation for future transit-oriented development long this unutilized corridor.

This concept is as bold as it is ingenious, and would solidify California as leader in green transportation technology. In fact, this would certainly become a model for cargo handling worldwide in an industry that has changed little since the 1960s.

Thank you for taking your time to consider my comments.

Regards,
Jason Herring

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 13:32:37

No Duplicates.

Comment 202 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mike
Last Name: Mielke
Email Address: mmielke@svlg.org
Affiliation: Silicon Valley Leadership Group

Subject: Cap & Trade Auction Revenue Use – Investment Plan Considerations
Comment:

On behalf of the Silicon Valley Leadership Groups' 375 members, I am writing you to provide input on the development of the AB 32 cap and trade auction revenue Investment Plan. The Silicon Valley Leadership Group, founded in 1978 by David Packard of Hewlett-Packard, represents more than 375 of Silicon Valley's most respected educational institutions and high-tech, bio-tech, and clean-tech employers; our members collectively provide nearly one of every three private sector jobs in Silicon Valley. As a supporter of AB 32 since its inception, we are proud to offer our comments below.

General Principles
For both legal reasons and to ensure the success of AB 32, the Silicon Valley Leadership Group supports the following general principles to help guide the development of the Investment Plan.

1. Nexus – Monies generated by the cap and trade auction program should adhere to the legal precedent for use of regulatory fees established by Sinclair Paint Co. v. State Board of Equalization (1997), with a direct link to verifiable greenhouse gas (GHG) reduction;
2.Leverage private investment – Because cap and trade auction monies are limited and the amount will vary over time, it is important to leverage private capital resources and investment as much as possible to advance the state's goals;
3.Support innovation and diffusion – In meeting the GHG reduction goals, the state must think both short- and long-term, focusing on technology diffusion (short-term) while also addressing the need to bolster support for research and innovation (long-term);
4.Phasing investments: We support using early program monies to advance deployment of clean and efficient energy and electric and alternative fuel infrastructure; along with the Transportation Coalition for Livable Communities, we believe that when fuels come under the cap in 2015, these monies should help fund mass transit and transit oriented development;

In developing the Investment Plan, the state should provide clear metrics for success (including performance and environmental objectives) in meeting the 2020 GHG reduction goal and milestones to track progress, while also providing a regular status report for public review.

Areas of Investment
The Leadership Group has identified areas in each of the broad categories contained in the Governor's budget where investments can

achieve significant GHG reductions and yield meaningful co-benefits such as job creation and improved public health. The areas include:

1.Clean and Efficient Energy and Next-generation Low-carbon Transportation
Large scale clean technology development and deployment will help reduce California's reliance on fossil fuels and significantly reduce the amount of GHGs the state produces. Further, deployment of these technologies will help create jobs across the state.

a.Sustainable Development Bank ("Green Bank"): Such a bank would provide low interest loans, performance-based grants and/or loan guarantees to those that want to invest in clean energy, energy efficiency, or electric and alternative fuel infrastructure. The bank is important as adequate financing is one of the key obstacles to the widespread deployment of clean and efficient energy solutions. In effect, the Bank would help ease transition to a clean economy by making clean and efficient energy technologies more cost competitive with fossil fuels.

We believe the Bank should be structured as a public-private partnership and as such, could better leverage private capital (we believe at up to a 10:1 ratio) in a fashion that mitigates investment risk, catalyzes market activity and lowers borrowing costs. The Sustainable Development Bank will enable innovative, commercially viable clean-energy technologies in such areas as wind, solar, geothermal, advanced biomass, increased efficiency, and clean and efficient transportation infrastructure and deployment of next-generation electric vehicles —to be deployed at greater scale.

The Bank should support deployment in a technology neutral fashion, so that the state is not in the role of picking winners and losers. The Bank should take into account and coordinate with new programs that are currently being implemented such as Prop 39 and other ongoing state programs. Finally, we believe the state can create an effective Sustainable Development Bank using a relatively small amount of funding (approximately $100 million) per year.

b.Existing Programs with GHG Reduction Benefits: The state has existing programs with proven GHG reduction benefits. Investing in these programs would allow the state to quickly achieve near-term GHG reductions through existing channels by avoiding the time it takes to create entirely new programs. Existing vehicles that could benefit from new funding include such as PACE programs, distributed generation deployments, clean energy generation and energy efficiency upgrades at public facilities, clean and efficient transportation infrastructure, and deployment of next-generation electric vehicles. Examples include:
•Commercial PACE programs
•California Solar Initiative (set to expire by 2017)
•Energy efficiency retrofit and rebate programs
•Emerging Renewables Program / Self Generation Incentive Program
•New Solar Homes Partnership
•AB 118 Program

c.New Programs with GHG Reduction Benefits: We agree with Clean Energy Working Group that the state should invest in new programs to help remove key barriers to clean and efficient technology deployment. These investments should be overseen by a single state agency and coordinated with existing programs. Gaps exist in the

following areas:
•Implementation of home/business energy efficiency, energy management and demand response technologies through rebates;
•Funding to accelerate and demonstrate integration of distributed generation and energy storage technologies with existing smart grid systems;
•Market facilitation for emerging technologies to help bridge the “valley of death”;
•Incentivize utilities and/or third parties to adopt and deploy smart grid-connected EVs;
•Direct grants for state/local investment in distributed generation - i.e. schools;
•Financing to encourage agricultural biogas production for the pipeline.

d.Green Prize to Spur R&D to Help Reach 2050 Goal: Deployment of existing technology, even at scale, will not enable California to reach its goal of reducing GHG emissions to 80 percent below 1990 levels by 2050, according to the California Council on Science and Technology.3 The report states that achieving this goal will require "intensive and sustained investment in new technologies.” Thus, we believe the state should consider creating a “Green Prize” which would help spur innovation in groundbreaking technology in any of a number of areas such as large-scale, commercially viable carbon sequestration.4 The “Green Prize” should complement the already existing EPIC program, which supports R&D, but currently will not fund research on carbon reduction, at least in the upcoming program cycle. We believe the state could create an effective Green Prize using a relatively small amount of funding (approximately $5 - 10 million) per year. Finally, we believe this effort would best be administered by a non-profit, working in close coordination with the state.

2.Natural Resources Management
Climate change is already leading to rising temperatures, increased rainfall variability, rising sea levels and other climatic changes such as more extreme weather events. It is critical for the state to begin addressing the impacts of current climate variability and future climate change by investing in natural resource measures that provide the co-benefits of GHG mitigation via sequestration while also helping the state prepare for a very different future.

We agree with a consortium of leading natural resources groups including the Nature Conservancy, the Pacific Forest Trust, etc., that some portion of the pollution fee dollars should support natural resources management activities that sequesters GHGs, whereby atmospheric carbon or methane is incorporated into plants, soils, and water. Highly productive sources of carbon sequestration include wetlands, forests and watersheds.

a.Forest Conservation and Restoration: California forests and vegetation remove vast amounts of carbon dioxide from the atmosphere. Forest conservation and, especially reforestation and afforestoration programs have the capacity to reduce GHG emissions and achieve multiple public and environmental benefits, including the protection of air and water quality, fish and wildlife habitat and recreation. Key programs that should be identified in the Investment Plan include:
•California Forest Improvement Program administered by CAL FIRE
•Working Forest Conservation Easement programs including CAL FIRE’s Forest Legacy;
•Program, the Wildlife Conservation Board’s (WCB) Forest

Conservation Program;
•The Sierra Nevada Conservancy, Tahoe Conservancy and State Coastal Conservancy.

b.Wetlands and Watershed Restoration: Wetlands and watershed restoration efforts in the Sacramento San Joaquin Delta, the San Francisco Bay and elsewhere provide opportunities to reduce methane and carbon dioxide emissions while also sequestering additional GHGs. These efforts can also help reduce land subsidence, protect areas from sea level rise, and enhance water quality. Existing State programs that could immediately supports these efforts include:
•The Inland Wetlands Conservation Program administered by the Wildlife Conservation Board;
•The Delta Conservancy and State Coastal Conservancy;
•The Watershed Program administered by the Department of Conservation.

3.Sustainable Infrastructure Development
Our land use patterns drive heavy greenhouse gas emissions from the transportation sector. Between 1975 and 2004, the number of miles driven by Californians increased more than 3% per year. In contrast, California's population growth was less than 2% per year during the same period.5 Doubling neighborhood density can reduce both vehicle trips and the number of miles driven by about 5%.

SB 375 required regional planning agencies to create a plan for how transportation and land use could reduce greenhouse gas emissions. The Leadership Group supported the legislation and is working to implement the bill at regional and local levels. The major challenge in the process is obtaining local buy-in. Local cities and counties push back on issues like tying transportation funds to future housing production or planning for more homes. Communities cite challenges such as reduced money for affordable housing and inadequate sewer and school infrastructure as impediments to building compact infill.

Therefore, we agree with the Transportation Coalition for Livable Communities that auction revenues derived from vehicle fuels should be used to fund transportation system needs in a way that achieves AB 32 objectives and builds on the framework of SB 375. Based on research, the proposed Livable Community Infrastructure Program would leverage a cost effective investment portfolio across transportation efficiency measures, land use incentives, and improved transportation options to yield the greatest GHG reductions associated with the transportation sector.

We support an array of transportation efficiency and land use incentives and improvements put forward by the Coalition, including:
a.Transportation efficiency measures:
• Network and demand management (e.g. transit/bike priority signalization; trip reduction programs; roundabouts/roadway modifications; congestion pricing);
•Transit service, maintenance and operating costs (e.g. Bus Rapid Transit);
•Increase funding for bike networks and pedestrian amenities, with an emphasis on bicycle and pedestrian connections to transit;
•Multi-modal network connectivity to reduce travel distances and improve access to parks, schools, jobs, housing, and markets for rural and urban communities (e.g. neighborhood scale planning);
•Augment funding for alternative fuel programs that promote the

mass adoption of new technologies;

b.Land use incentives and improved transportation options:
•Funding to develop and implement land use modifications to support regional plans (e.g. updating zoning codes, parking standards, Level of Service policies);
•Other community infrastructure (e.g. water, sewer, greening) to support Transit Oriented Development, affordable housing, urban infill and small walkable communities in rural neighborhoods;
•Enact planning and zoning changes in Priority Development Areas.
•Reward jurisdictions with flexible infrastructure funds when it approves compact homes and/or workplaces. This could be done through a program like the One Bay Area Grant or Transportation for Livable Communities;
•Plan and build compact, affordable homes and dense offices near transit paired with car-share memberships and transit passes.

We believe that investing in the areas detailed above, guided by the principles we also outline, will help the state achieve measureable GHG reductions in both the near- and long-term, realize meaningful co-benefits, and help maintain public support for California’s leadership in addressing climate change and clean air.

Our members appreciate the opportunity to submit comments on this important matter and look forward to working with you as the state continues to develop both the Investment Plan and the Expenditure Plan.

Attachment: www.arb.ca.gov/lists/com-attach/228-2013investmentpln-ws-WzYHYAR3V2cKZAdY.pdf

Original File Name: March 8 SVLG Investment Plan Letter to ARB & DoF v4.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:30:47

No Duplicates.

Comment 203 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Trish
Last Name: Roath
Email Address: trish@crrcnorth.org
Affiliation: California Refuse Recycling Council

Subject: Allocation of Cap and Trade Proceeds
Comment:

See attached letter.

Attachment: www.arb.ca.gov/lists/com-attach/230-2013investmentpln-ws-WzgFcVMgV2dQe1U2.pdf

Original File Name: CRRC-CARBCapandTradeletterFinal (2).pdf

Date and Time Comment Was Submitted: 2013-03-08 13:33:50

No Duplicates.

Comment 204 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jane
Last Name: White
Email Address: jwhite@dpw.lacounty.gov
Affiliation: ITS California

Subject: ITS California CARB Cap and Trade Investment Proposal
Comment:

See attached file.

Attachment: www.arb.ca.gov/lists/com-attach/231-2013investmentpln-ws-UzpQIlAiUV0BZAFg.pdf

Original File Name: ITS CA Support-Letter_Cap and Trade.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:33:16

No Duplicates.

Comment 205 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: David
Last Name: Almeida
Email Address: david.almeida@energycenter.org
Affiliation: California Center for Sustainable Energy

Subject: CCSE Comments to the Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Please see detailed comments attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/232-2013investmentpln-ws-AWIBZAR2U2UEXQV1.pdf

Original File Name: CCSE Public Comments Cap and Trade Auction Proceeds Investment Plan.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:40:27

No Duplicates.

Comment 206 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Evan
Last Name: Edgar
Email Address: evan@edgarinc.org
Affiliation: compost industry

Subject: Reauthoization of AB 118 and Biomethane Programs
Comment:

```
Reauthorization of AB 118 is key for the development of carbon
negative CNG fuel for the organic collection fleet
```

Attachment: www.arb.ca.gov/lists/com-attach/233-2013investmentpln-ws-UzZTMVI0AzELfwIv.pdf

Original File Name: Edgar-CARBCapandTradeletterFinal.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:41:11

No Duplicates.

Comment 207 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Cynthia
Last Name: Vitale
Email Address: cynthia@csgcalifornia.com
Affiliation: Conservation Strategy Group

Subject: Local Governments' Proposal for CARB Auction Revenue Investment Plan
Comment:

Mary Nichols,
Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95184

Re: Local Governments' Proposal for CARB Auction Revenue Investment Plan

Dear Ms. Nichols,

The undersigned cities, counties, special districts and associations collectively have developed a proposal for investing cap and trade auction revenue in local governments in an effort to achieve the greenhouse gas reduction goals of AB 32 that is consistent with the provisions of AB 1532 and SB 535. We respectfully request that our proposal be considered for inclusion in the Investment Plan.

The underlying principle of our proposal is that the state would be best served if it employed local governments as a delivery tool for a range of investments, and that the Investment Plan should create a program for local governments to access a portion of the funds generated from the Cap and Trade auctions.

Local governments are already engaged in many of the same type of GHG reduction activities contemplated in the Governor's Budget and are best able to identify and implement projects to reflect local needs, leverage other funding and achieve the greatest reductions of Greenhouse Gases. Local governments have already developed programs that improve energy efficiency, divert waste, increase urban greening, upgrade fleets and facilities, and plan for cleaner more efficient communities, but funding to continue these projects is dwindling.

Another advantage for local governments is that they have a greater understanding of the local economy, providing an advantage over the state to leverage private capital and allowing auction revenue funds to go further.

Our coalition would like to work with CARB and the Administration to create an effective approach to maximize GHG reductions and propel California's communities forward through expenditure of auction revenue. As mentioned above, local governments can be a key facilitator for the state to achieve these goals, and request

you consider the following principles in creating a local government program:

1. Allocate auction revenue for local assistance grants and other financial assistance to develop and implement GHG emission reduction projects;
2. Administer the program in coordination with the Strategic Growth Council
3. Develop standards and guidelines for grant funds that achieve one or more of the following:
a. Promote public-private partnerships to implement energy efficiency and clean energy projects with financing incentives for residential and commercial facilities.
b. Decrease air or water pollution
c. Reduce the consumption of natural resources or energy
d. Provide opportunities to achieve greenhouse gas emission reductions in ways that increase localized energy resources
e. Increase the reliability of local water supplies
f. Increase solid waste diversion from landfills
g. Increase electric vehicle infrastructure
h. Achieve greenhouse gas emission reductions in ways that reduce vehicle miles traveled.
i. Prevent conversion of agricultural, forest, and open space lands to uses that result in higher greenhouse gas emissions
4. Prioritize projects that have the ability to be implemented regionally, leverage additional public and/or private funding, achieve co-benefits, are replicable and consider geographic and socioeconomic issues.
5. Provides opportunities for jurisdictions with either small or large populations.
6. Provides funding for both:
a. The development and implementation of innovative projects that create new systems or technologies to be deployed at a local or regional level
b. Implementation of existing, proven GHG emission reducing or sequestering projects, especially those projects and programs already adopted by local agencies. These projects should receive funding on a competitive basis.

We respectfully request that you consider these principles and allow us an opportunity to work with you to refine these concepts so that local governments can continue helping the state meet the goals of AB 32.

Sincerely,

Jennifer Whiting, Legislative Representative, League of Cities

Kate Meis,Associate Director, Local Government Commission

Cara Martinson, Associate Legislative Representative, California State Association of Counties

Carol Misseldine, Director, Green Cities California

Attachment: www.arb.ca.gov/lists/com-attach/234-2013investmentpln-ws-W2hVfQM6WSQKPVRn.docx

Original File Name: 3.8.13 ARB Comment Letter- Loc Gov.docx

Date and Time Comment Was Submitted: 2013-03-08 13:32:39

No Duplicates.

Comment 208 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kirsten
Last Name: Schwind
Email Address: kirsten@baylocalize.org
Affiliation: Bay Localize

Subject: Bay Localize Cap and Trade Comments
Comment:

Dear CARB,

Bay Localize is pleased to weigh in on the allocation of California's Cap and Trade funds. Bay Localize, a nonprofit based in Oakland, builds equitable and climate-resilient communities throughout the nine-county Bay Area. Bay Localize also hosts the Local Clean Energy Alliance, Northern California's largest grassroots clean energy advocacy alliance with more than 90 member organizations.

We respectfully request CARB prioritize spending on the following items:

1) Revolving loan fund for municipalities launching Community Choice Energy programs. Bay Localize and the Local Clean Energy Alliance are supporting the local governments of San Francisco, Sonoma County, and the Cities of Oakland and Berkeley in their efforts to launch their own community choice programs to offer the lowest GHG energy mix possible to their residents and ramp up energy efficiency programs through locally-tailored outreach. However, initial financing for start up costs are a barrier. A revolving loan fund would enable these municipalities to move forward in their desire to meet their ambitious GHG reduction goals.

2) Funding for transit. Bay Localize supports the "Cap & Trade Auction Revenue Proposal: Funding for transportation choices and homes affordable to core transit riders" developed by Transform and other colleagues.

3) Energy efficiency programs for renters and low/middle income homeowners. These populations are frequently left out of energy efficiency programs, resulting in state subsidies to higher-income households. Cap and Trade funds offer a golden opportunity to pilot and scale up programs to address these populations. We especially support mandated energy efficiency standards in rental units, similar to the program in Boulder, Colorado that requires landlord to meet building energy standards in order to renew their rental licenses. See http://www.bouldercolorado.gov/index.php?option=com_content&id=179&Itemid=513.

4) Climate resilience in vulnerable communities. Bay Localize has been contracted by the Bay Area Joint Policy Commission to research and draft recommendations for regional government to partner with vulnerable communities in adaptation planning. Our draft

recommendations are available at http://www.baylocalize.org/files/EquityReportProof%28HighQP%29v7.pdf . We believe many common-sense investments in vulnerable communities, including those listed above and identified by the SB 353 coalition (Greenlining Institute, etc), meet both GHG reduction and climate adaptation goals.

Thank you for your consideration, and we look forward to working with you on implementation of these wonderful programs.

Sincerely,

Kirsten Schwind
Director, Bay Localize

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 13:00:03

No Duplicates.

Comment 209 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Emily
Last Name: Reyna
Email Address: ereyna@edf.org
Affiliation: EDF

Subject: EDF Comments on Investment Plan for Allowance Proceeds.
Comment:

```
Please accept the attached letter as EDF's comments on the
investment plan for AB 32 cap-and-trade auction proceeds.

EDF looks forward to working with you and your staff as CARB
finalizes the investment plan. Please do not hesitate to contact us
with any questions.
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Attachment: www.arb.ca.gov/lists/com-attach/236-2013investmentpln-ws-BWhRNgR3UGAHaVUK.pdf

Original File Name: March 8 2013 - EDF Auction Proceeds Comments - FINAL.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:54:35

No Duplicates.

Comment 210 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Rye
Last Name: Baerg
Email Address: rye@saferoutespartnership.org
Affiliation: Safe Routes to School National Partnersh

Subject: Cap and Trade Expenditure Plan
Comment:

```
Please find attached our letter on how Cap-and-Trade auction
revenues should be spent regarding active transportation. In
addition we have included our analysis of the nexus for
cap-and-trade revenues and active transportation and our analysis
of the 2011 Transportation Needs Assessment.
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Attachment: www.arb.ca.gov/lists/com-attach/237-2013investmentpln-ws-B3RSJlAlV3cAaABw.zip

Original File Name: SRTSNP Cap-and-Trade Comments.zip

Date and Time Comment Was Submitted: 2013-03-08 13:38:48

No Duplicates.

Comment 211 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jon
Last Name: Costantino
Email Address: jcostantino@manatt.com
Affiliation: PARC

Subject: PARC Comments
Comment:

```
Please find attached, PARC's Cap and Trade Auction Proceeds
comments/recommendations on the first investment plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/238-2013investmentpln-ws-AHBRNlEiBDRWDwVk.pdf

Original File Name: PARC Auction Proceeds Comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:56:25

No Duplicates.

Comment 212 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: John
Last Name: Brauer
Email Address: jbrauer@calaborfed.org
Affiliation: CA Labor Federation

Subject: Investment Plan - Workforce Investments
Comment:

```
Please read the attached letter regarding comments.

Thank you.
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Attachment: www.arb.ca.gov/lists/com-attach/239-2013investmentpln-ws-BWZUPgFmADBROAlk.pdf

Original File Name: clfcommentsonc&t.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:57:43

No Duplicates.

Comment 213 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tom
Last Name: Modica
Email Address: Tom.Modica@longbeach.gov
Affiliation: City of Long Beach

Subject: City of Long Beach Comment Letter-Cap and Trade Proceeds
Comment:

March 8, 2013

Mr. Matt Rodriquez
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95812

Re: City of Long Beach input on the development of an investment plan for auction proceeds from the State's cap-and-trade program to reduce greenhouse gases

Dear Secretary Rodriquez:

On behalf of the City of Long Beach, I write in support of the progress that has been made by CalEPA and the California Air Resources Board to implement the State's cap-and-trade program. The City is particularly encouraged CalEPA has recognized communities along the southern I-710 corridor as disadvantaged communities for investment per SB 535, and requests cap-and-trade auction proceeds be directed to local governments to implement local projects that will reduce greenhouse gases in these and adjacent communities.

Long Beach, population 461,257 (2010), is the second largest city in the County of Los Angeles and the seventh largest in California. Located directly adjacent to the Ports of Long Beach and Los Angeles, the City contains four zip codes, which CalEPA classifies as high priority, and places within the top five-percent bracket on the CalEnviroScreen map [CALENVIROSCREEN Top 5% Base Map – Los Angeles Area (Jan 2013)]. These areas are urban, densely populated, and home to a community that represents various ethnic and socioeconomic backgrounds.

As noted in the agencies' report, there are several sources of greenhouse gas emissions that directly contribute to climate change. The City of Long Beach recognizes that structural changes in transportation planning, energy, building and neighborhood programs, urban nature, waste reduction and water conservation are needed to create a more sustainable future with significantly less greenhouse gas emissions.

Three years ago, Long Beach adopted the Sustainable City Action Plan (SCAP) with the mission to create a comprehensive, citywide model for sustainable programs and projects that would lead Long

Beach towards becoming a greener, more sustainable community. The plan was drafted through collaboration with City staff, the Sustainable City Commission, and the citizens of Long Beach. On February 2, 2010, the Long Beach City Council adopted SCAP to focus on reducing greenhouse gases through policy and operational changes in transportation, energy, planning and building, waste reduction and water conservation to create a more sustainable Long Beach.

The SCAP holds potential to make Long Beach one of the greenest cities in the State, perhaps in the nation. The plan has been carefully drafted and administered since its inception in 2010 and the City has accomplished many beneficial projects and programs with limited resources and funding. Through policy changes, and programs and projects consistent with SCAP, Long Beach has been able to foster sustainable initiatives that involve transportation improvements, green spaces and corridors, urban agriculture and forestry, energy use and generation, water quality improvements throughout the City; and especially in disadvantaged communities.

Presently, Long Beach transportation planning has shifted towards the concept of “complete streets”, a focus on transit-oriented development in new construction. We have implemented programs to leverage city resources with the needs of our community, such a graywater installations, and a very popular mulch delivery program. Long Beach has installed over 120 miles of bike lanes and bike “sharrows” on major corridors connecting neighborhoods to businesses and key places throughout the City to reduce vehicle miles traveled. The City is also in the midst of planting 10,000 trees throughout greenhouse gas impacted neighborhoods. Along with the above mentioned projects, Long Beach offers a Green Business Recognition Program to businesses that strive to become environmentally sustainable. All of these programs are designed to meet the ultimate goal of reducing greenhouse gases in Long Beach.

With the proposed use of cap-and-trade auction proceeds going towards GHG reduction and sequestering methods, the City of Long Beach supports the visions and guidelines that have been laid out in SB 1532 and SB 535. This support is due to the direct correlation of these measures to projects and programs outlined in the City’s SCAP.

What is needed now is additional funding to implement larger infrastructure programs and projects that will reduce greenhouse gases from goods movement and transportation in the region. At this time, the City of Long Beach is encouraged CalEPA has recognized communities along the southern I-710 corridor as disadvantaged communities for investment per SB 535, and requests cap-and-trade auction proceeds be directed to local governments to implement local projects and programs that will reduce greenhouse gases in these and adjacent communities.

Thank you for your attention to this matter. Should you have questions, please contact Tom Modica, Director of Government Affairs and Strategic Initiatives at 562-570-5606 or Tom.Modica@longbeach.gov.

Sincerely,

Mayor Bob Foster
City of Long Beach

Attachment: www.arb.ca.gov/lists/com-attach/240-2013investmentpln-ws-VjUFalAlVnwFXAdo.pdf

Original File Name: City of Long Beach_Comment Letter_3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:02:58

No Duplicates.

Comment 214 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jim
Last Name: Kemp
Email Address: jkemp@sbcag.org
Affiliation:

Subject: Comments on Draft Concept Paper and Workshop
Comment:

```
Dear Ms. Nichols,

Please see the attached comment letter from the Central Coast
Coalition.

Thank you for considering our comments. If you have any questions,
please contact me at jkemp@sbcag.org or 805-961-8908.

Jim Kemp
Central Coast Coalition Chair
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Attachment: www.arb.ca.gov/lists/com-attach/241-2013investmentpln-ws-VTZXMFwtBQlRNghm.pdf

Original File Name: Cap and Trade CCC comment letter.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:57:03

No Duplicates.

Comment 215 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Coby
Last Name: Sjye
Email Address: coby@greens.org
Affiliation: Sierra Club, Long Beach Area Group

Subject: Please prioritize zero emissions technologies and renewable energy
Comment:

To the members of the California Air Resources Board,
The Sierra Club's Mission to Explore, Enjoy and Protect the wild places on earth is facing what seem consider our most profound challenge in the face of climate change. Precious open spaces and wildlife habitats as well as endangered species we've fought so hard to protect may well be decimated by the effects of climate change, nullifying collective efforts and decades of work. It is absolutely imperative that we address climate change, and we simply don't have time for half-measures.

California is clearly leading the effort in the U.S. with the passage of AB 32, and the Cap & Trade auction revenues provide a rare opportunity in the current economic climate to fund bog, bold initiatives to address this challenge. More than anything, we urge you to take bold actions and aim for the strongest measures with the highest impact, rather than feel good half-measures that won't get us where we need to be to avoid catastrophe.

In particular, we urge you to focus on zero emissions transportation technologies and net-zero emissions renewable energy. Although a 33% RPS is an improvement over where we were in years past, we need 90+% renewable to make the kind of cuts in GHG emissions needed to get our emissions under control. Although we have finally brought back a modest ZEV program, almost as aggressive as it was in the 1990's, we need to rapidly replace the millions of cars, trucks and trains that move goods and people using fossil fuels with ones that can be powered by our newer, cleaner, smarter grid.

We can make rapid changes, the kind America made during World War II, if we face climate change as the kind of disaster than can have as much or more of an impact as Nazi Germany. Start with the largest users and systems, not just to cover under a Cap & Trade system that gets us back to 1990 levels (which were still far too high), but to provide large scale carrots and sticks that would allow them to scrap and replace polluting systems entirely.

Please lead the country and the world to a place where we can truly be sustainable, in terms of our carbon emissions, our environmental footprint, and our social safety net.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 13:53:19

No Duplicates.

Comment 216 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: David
Last Name: Bischel
Email Address: sophiar@calforests.org
Affiliation: California Forestry Association

Subject: Calforests Comments to Cap and Trade Auction Proceeds Investment Plan
Comment:

See attached comment letter.

Attachment: www.arb.ca.gov/lists/com-attach/243-2013investmentpln-ws-UTJQNwFsUGVVPAh6.pdf

Original File Name: Calforests Comments to Cap and Trade.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:06:57

No Duplicates.

Comment 217 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Connie
Last Name: Gallippi
Email Address: connie@csgcalifornia.com
Affiliation: Conservation Strategy Group

Subject: Urban Forestry Investments
Comment:

```
Please see attached a coalition letter regarding AB 32 investments
in urban forestry.
```

Attachment: www.arb.ca.gov/lists/com-attach/245-2013investmentpln-ws-UidRJVU2UGJQOANc.pdf

Original File Name: Urban forestry ARB letter_final_3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:10:32

No Duplicates.

Comment 218 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Nancy
Last Name: Hughes
Email Address: njhughes@caufc.org
Affiliation: California Urban Forests Council

Subject: Investments in Urban Foresty
Comment:

```
Please see the attached letter from the California Urban Forests
Council and its seven Regional Councils regarding AB 32 investments
in urban forests.
```

Attachment: www.arb.ca.gov/lists/com-attach/246-2013investmentpln-ws-UjFRNlElBzJVMAlW.pdf

Original File Name: CaUFC_Councils_ARB_Let_3 8 13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:12:36

No Duplicates.

Comment 219 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ann
Last Name: Trowbridge
Email Address: atrowbridge@daycartermurphy.com
Affiliation: Day Carter & Murphy LLP

Subject: Comments of CCDC RE Draft Concept Paper Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Please see the attached Comments.  If you have any problems with
the attachment, please contact Barb Taylor.  Thank you.
```

```
Barb Taylor
Day Carter & Murphy LLP
3620 American River Drive, Suite 205
Sacramento, CA  95864
(916) 570-2500 X 112
btaylor@daycartermurphy.com
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Attachment: www.arb.ca.gov/lists/com-attach/247-2013investmentpln-ws-AGMHbgdrUG5XNAVr.pdf

Original File Name: Comments on Draft Concept Paper.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:15:33

No Duplicates.

Comment 220 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dean
Last Name: Kubani
Email Address: dean.kubani@smgov.net
Affiliation: City of Santa Monica

Subject: Comment letter from City of Santa Monica
Comment:

```
Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/248-2013investmentpln-ws-Uj5TMFciVHMEZ1Qm.docx

Original File Name: Letter to CARB for the City of Santa Monica on Cap and Trade Investment - March 8.docx

Date and Time Comment Was Submitted: 2013-03-08 14:12:00

No Duplicates.

Comment 221 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Richard
Last Name: Halsey
Email Address: rwh@californiachaparral.org
Affiliation: California Chaparral Institute

Subject: Comment on Draft Investment Plan for the Cap & Trade Revenue Auctions
Comment:

```
Please see our attached comment letter regarding the importance of
including conservation and natural resources in the Board's Plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/249-2013investmentpln-ws-UjMAb1wvVVkCdgFk.pdf

Original File Name: Air Resources Board GH Goal Plan CCI comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 13:22:18

No Duplicates.

Comment 222 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dave
Last Name: Davis
Email Address: DDavis@cecmail.org
Affiliation: Community Environmental Council

Subject: Cap and Trade Investment Plan Public Comments by Community Environmental Council
Comment:

```
Please see attached for comments
```

Attachment: www.arb.ca.gov/lists/com-attach/250-2013investmentpln-ws-AmEAZ10sBDYLYwlt.pdf

Original File Name: CapAndTrade_AuctionProceedsInvestmentPlan_Comments_SBCEC.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:20:29

No Duplicates.

Comment 223 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: J.P.
Last Name: Cativiela
Email Address: dairycares@aol.com
Affiliation: Dairy Cares coalition

Subject: Investment plan
Comment:

```
Please see attached letter
```

Attachment: www.arb.ca.gov/lists/com-attach/251-2013investmentpln-ws-VzNTNFA4V3ZQLwZl.pdf

Original File Name: DairyCares comment 3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:22:30

No Duplicates.

Comment 224 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kristi
Last Name: Birney
Email Address: kbirney@EnvironmentalDefenseCenter.org
Affiliation: Environmental Defense Center

Subject: Use of Cap-and-Trade Auction Funds: Vessel Speed Reduction Incentive Program
Comment:

Dear Ms. Nichols and Board Members:

The Environmental Defense Center (EDC) supports the proposal by the Santa Barbara County Air Pollution Control District (SBCAPCD) to use some of the Cap-and-Trade auction revenue to develop an incentive program that will voluntarily reduce the speeds of large marine ships traveling along the California coast.

This proposal, known as the Vessel Speed Reduction Incentive (VSR) Initiative, fulfills multiple objectives of AB 32 (Global Warming Solutions Act of 2006), AB 1532 and SB 535 (Greenhouse Gas Reduction Fund) while also meeting California's clean-transportation goals and sustainable freight strategies. By supporting this initiative the California Air Resources Board (CARB) would be investing in low-carbon freight transportation, a priority identified in the Cap-and-Trade Auction Proceeds Investment Plan Draft Concept Paper (Investment Plan).

I have attached a comment letter providing detail. Thank you for your consideration of this request.

Kristi Birney
Marine Conservation Analyst
Environmental Defense Center

Attachment: www.arb.ca.gov/lists/com-attach/252-2013investmentpln-ws-VjBQPwNsWGpXPVIN.pdf

Original File Name: Final_EDCltr_re CARB cap and trade 3.08.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:19:45

No Duplicates.

Comment 225 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Parisa
Last Name: Fatehi-Weeks
Email Address: pfatehi@publicadvocates.org
Affiliation: Public Advocates Inc.

Subject: Principles for Implementing SB 535 to Benefit Disadvantaged Communities
Comment:

On behalf of the nearly 50 organizations listed below, we recommend that the Administration adopt and act according to the following principles to ensure that SB 535 is implemented in a manner that meaningfully benefits disadvantaged communities:

1. Make the process inclusive, transparent and accountable. ARB should ensure transparency, accountability and the robust public participation of disadvantaged communities in the process of developing and implementing an investment plan:
- Public participation of disadvantaged communities – a core principle of Environmental Justice – must be integrated into the implementation of SB 535, at both the state and regional/local level.
- Proposed investments of SB 535 funds should be transparently itemized as falling under the 25 percent or 10 percent category.
- All agencies (including local and regional agencies) responsible for carrying out projects funded with SB 535 funds should be held accountable to ensure that promised benefits are delivered, measured and reported.

2. Invest in High Priority Needs. Disadvantaged communities have needs that are distinct from those of the general public; for instance, they are subject to well-documented disparities in health outcomes. Disadvantaged communities benefit when their distinctive needs are met. The benefits of each investment made with SB 535 funds should specifically address high priority needs of disadvantaged communities. ARB should ensure that projects deliver significant benefits by meeting priority needs well. Eventually, ARB should implement metrics to quantify the co-benefits to disadvantaged communities (e.g., improvements in housing, transit, job and public health outcomes) of GHG-reducing projects. Setting performance measures will make the process more transparent while also facilitating DOF reporting on the outcomes of these investments.

3. Benefits Must Outweigh Burdens. There are many projects that, while considered beneficial to some, generate harmful impacts that are disproportionately concentrated in disadvantaged communities. The benefits of SB 535 investments on disadvantaged communities must significantly outweigh the burdens that the projects may impose on those communities.

These principles are submitted on behalf of nearly 50 organizations from across California:

Asian and Pacific Islanders California Action Network (APIsCAN)
Allen Temple Baptist Church
Asian Pacific Environmental Network (APEN)
Asian Immigrant Women Advocates
Asian Neighborhood Design
Asian Pacific Policy & Planning Council (A3PCON)
Bay Area Healthy 880 Communities
Bay Localize
Breakthrough Communities
CA ReLeaf
California Housing Partnership Corporation (CHPC)
California Rural Legal Assistance Foundation
California Rural Legal Assistance, Inc.
California WALKS
Catholic Charities, Diocese of Stockton
Center for Sustainable Neighborhoods
Chicana/Latina Foundation
Coalition for Clean Air
East Bay Housing Organizations (EBHO)
El Concilio of San Mateo County
EndOil / Communities for Clean Ports
Fresno Metro Ministries
Environmental Justice Task Force of A3PCON
Genesis
Great Leap
Green for All
Greenlining Institute
Housing California
Kennedy Commission
Leadership Counsel for Justice and Accountability
Marin Grassroots
Nail Salon Women Greening Their Jobs and the Environment
New Voices Are Rising Project (of the Rose Foundation for Communities and the Environment)
North Bay Organizing Project
People's Community Organization for Reform and Empowerment (People's CORE)
Public Advocates Inc.
Public Interest Law Project / California Affordable Housing Law Project
Regional Asthma Management & Prevention (RAMP)
Sacramento Housing Alliance (SHA)
Safe Routes to School National Partnership
Sierra Club California
The City Project
TransForm
Unitarian
Universalist Legislative Ministry California (UULMCA)
Urban Habitat
WALKSacramento
Western Center on Law and Poverty

See attached for a PDF version of the principles.

Sincerely,
Parisa Fatehi-Weeks
Public Advocates, Inc.

Attachment: www.arb.ca.gov/lists/com-attach/253-2013investmentpln-ws-WyhcOFULVDIBNFNm.pdf

Original File Name: SB 535 Principles_with endorsements_03 08 13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:18:37

No Duplicates.

Comment 226 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: L. Willard
Last Name: Richards
Email Address: willard@sonic.net
Affiliation: Chair, SCTLC (See message)

Subject: Investment of Cap and Trade Proceeds
Comment:

The Sonoma County Transportation and Land-use Coalition appreciates this opportunity to comment on the appropriate investment of Cap and Trade auction proceeds. It is important for these proceeds not only to be distributed promptly and efficiently, but for the wisdom of the distribution methods to be readily understood as fair and reasonable by those most affected. The rising costs of energy must not only be foreseeable, but balanced by an equitable return of auction proceeds to enable timely responses by all energy consumers.

It is particularly important that transit agencies have adequate funding to steadily increase service for more compact communities. A broad range of investments in the transportation sector will be needed as it enters the program in 2015, including a large increase in the EV recharging network.

Businesses, individuals, and public entities must not only be given price signals that encourage conservation of energy; all sectors of the economy must have the wherewithal to make investments that respond to those signals. These investments may include building retrofits such as weather-stripping, sealing of air leaks, insulation upgrades, energy-efficient equipment, appliances, and HVAC, as well as acquisition of vehicles that use little or no gasoline. Some may want to relocate from suburbs to more compact, walkable places. The proposed electricity sector rebates will compensate consumers for only a few of those additional costs, as there will be indirect costs from other goods and services.

In fact, the effects of higher energy costs are so broadly distributed through the economy that it makes sense to have a large part of the cap and trade investment program consist of a direct per capita dividend to the consumer. Such a method will efficiently accomplish the AB32 goals relating to equity, and maximize additional environmental, economic, and overall societal benefits.

It may also be desirable to have an additional dividend to residents in disadvantaged communities. Such individuals might be more strongly impacted by rising energy costs than the general population. These communities should be studied in the planning process to see whether dividends or public investments are likely to be the most efficient and effective.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 14:26:41

No Duplicates.

Comment 227 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Timothy
Last Name: Tutt
Email Address: ttutt@smud.org
Affiliation:

Subject: Comments on investment of auction proceeds
Comment:

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Thanks for the opportunity to provide the attached comments.
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Attachment: www.arb.ca.gov/lists/com-attach/255-2013investmentpln-ws-VyRVPgRwBDMAYQdv.pdf

Original File Name: SMUDGHGRevenuecomments3082013.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:39:26

No Duplicates.

Comment 228 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jennifer
Last Name: Domeier
Email Address: jennifer.domeier@sdcounty.ca.gov
Affiliation: County of San Diego

Subject: County of San Diego Cap and Trade Investment Plan Comments
Comment:

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Please see attached comment letter dated March 8, 2013 from the
County of San Diego.
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Attachment: www.arb.ca.gov/lists/com-attach/256-2013investmentpln-ws-UTJXPlAkBzpVJwlw.pdf

Original File Name: CountyofSanDiego_Cap-and-Trade_3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:14:19

No Duplicates.

Comment 229 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: John
Last Name: Larrea
Email Address: john@clfp.com
Affiliation: CA League of Food Processors

Subject: Comments on Investment Plan Workshop
Comment:

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CLFP Investment Plan Workshop Comments
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Attachment: www.arb.ca.gov/lists/com-attach/257-2013investmentpln-ws-VDcFYgNdV2gBYgdm.pdf

Original File Name: CA League of Food Processors - Comments on Investment Plan.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:49:47

No Duplicates.

Comment 230 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Shelli
Last Name: Lamb
Email Address: lamb@rcrcd.com
Affiliation: Riverside-Corona RCD

Subject: Cap & Trade Written Comments
Comment:

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Please find attached written comments from the Riverside-Corona RCD
and the State's Cap & Trade Investment Plan
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Attachment: www.arb.ca.gov/lists/com-attach/258-2013investmentpln-ws-AGNXMAFwUFwEXQRb.pdf

Original File Name: Cap & Trade Public Comment -Riverside-Corona RCD 3-08-13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:50:35

No Duplicates.

Comment 231 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Elisabeth M
Last Name: Brown
Email Address: lagunagreenbelt@gmail.com
Affiliation: Laguna Greenbelt, Inc.

Subject: Comments on Cap & Trade to reduce GHGs
Comment:

```
Attached please find our two page letter, a .pdf document.

Thank you,
Elisabeth M. Brown, Ph.D
President,
Laguna Greenbelt, Inc.
```

Attachment: www.arb.ca.gov/lists/com-attach/259-2013investmentpln-ws-UzJdKVMwU19WPARh.pdf

Original File Name: ARB letter&attach 3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:49:27

No Duplicates.

Comment 232 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Matthew
Last Name: Marsom
Email Address: matthew.marsom@phi.org
Affiliation: Public Health Institute

Subject: PHI Comments Regarding Investment Plan for Auction Proceeds from the Cap and Trade Program
Comment:

The Public Health Institute (PHI) strongly urges the California Air Resources Board (CARB) to prioritize the funding of climate mitigation strategies with significant health co-benefits, in communities that already suffer the greatest health inequities. We ask that the revenue allocation process from the cap and trade program explicitly incorporate health and health equity criteria, and that CARB ensure the inclusion of public health experts in that process.

Climate change is one of the biggest public health threats of this century, undermining our air quality, the availability of clean drinking water, our food supply, our homes, and our security. Climate change disproportionately impacts vulnerable populations, including low-income communities and people of color, those with chronic illness, and the young and old; climate change thus exacerbates existing health inequities.

Many – but not all – strategies to reduce greenhouse gas emissions have significant health co-benefits, or positive impacts on health that are not directly related to the impact on climate change itself. Below we identify several examples of mitigation strategies with health co-benefits, but note that this list is exemplary, not exhaustive.

1. EXPANDING AND ENHANCING INFRASTRUCTURE TO SUPPORT ACTIVE TRANSPORTATION, INCLUDING WALKING, BICYCLING AND PUBLIC TRANSIT USE:

Increasing active transportation is a critical strategy for reducing greenhouse gas emissions (GHGE) from transportation, and the mitigation strategy likely to yield by far the greatest health co-benefits. A recent study, published in the American Journal of Public Health and authored by Dr. Neil Maizlish of the California Department of Public Health, forecast the health impacts of various strategies to reduce transportation greenhouse gas emissions. The study found that increasing median daily walking and bicycling from 4 to 22 minutes reduced the burden of cardiovascular disease and diabetes by 14%, with significant decreases in breast and prostate cancer, osteoporosis, and depression, and decreased GHGE by 14%; low-carbon driving (fuel efficiency and low-carbon fuels) reduced GHGE by 33.5% but had a far lesser health impact, reducing cardiorespiratory disease burden by less than 1%. It should be noted that the model also forecast a significant increase in

pedestrian and bicyclist injuries.

These results are comparable to those found in a number of other similar studies conducted internationally. The health benefits of increased physical activity associated with increased active transportation could equal those of our greatest public health achievements, particularly if careful attention is also paid to ensuring that active transportation infrastructure is safe. A large investment of cap and trade revenue in active transportation infrastructure is highly recommended.

2. EXPANDING AND ENHANCING URBAN GREENING:

Urban green space and tree canopy can act as a significant carbon sink, absorbing carbon, and simultaneously provide multiple other benefits including reduction in the urban heat island effect, decreased storm water runoff, increased groundwater recharge, and aesthetically pleasing places for people to exercise, play, and congregate. Mitigation of the urban heat island can also have significant impacts on reducing energy use, and thus GHGEs. Urban greenspace can also include school and community gardens that increase access to affordable healthy food. As the earth warms and extreme heat events become increasingly frequent and severe, the health toll of extreme heat events is expected to grow substantially; there were more than 70,000 excess deaths in the European heat wave of 2003, and 650 in the California heat wave of 2006. Without substantial investment in urban green space and tree canopy, as well as other cooling strategies such as cool roofs, cool pavements and green roofs, it is likely that infill development and increased residential density will add to the urban heat island effect with its concomitant adverse health impacts.

3. IMPROVING AIR QUALITY:

a. Reductions in air pollution, particularly in communities with existing high levels of pollution, can improve health and reduce inequities. We recommend funding of strategies to reduce air pollution associated with goods movement, such as trucks and ships.

b. Energy efficiency: We strongly support weatherization of homes as a strategy for reducing greenhouse gas emissions through energy efficiency, particularly if weatherization programs target renters and multi-family housing in lower-income areas. However, we caution that weatherization programs must be attentive to common health hazards in poorly maintained homes, such as mold or lead; care must be taken to ensure that these programs do not inadvertently increase indoor air pollution.

PHI stands ready to assist CARB in any way we can to ensure that cap and trade revenues are allocated in a manner that optimizes the health co-benefits of strategies to reduce greenhouse gas emissions, with an emphasis on reducing health inequities.

ABOUT THE PUBLIC HEALTH INSTITUTE:
The Public Health Institute, an independent nonprofit organization, is dedicated to promoting health, well-being and quality of life for people throughout the world. PHI's primary methods for achieving these goals include: sharing evidence developed through quality research and evaluation; conducting public policy and advocacy; providing training and technical assistance; and promoting successful prevention strategies to policymakers,

communities and individuals. For more information, visit www.phi.org.

Matthew Marsom, Vice-President for Public Health Policy & Advocacy
Linda Rudolph, MD, MPH, Center for Public Health and Climate Change at PHI

Attachment: www.arb.ca.gov/lists/com-attach/260-2013investmentpln-ws-ViZSPAFpAw8GYwZn.pdf

Original File Name: PHI_CARB Submission_GHC Revenue Scheme_March 2013.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:47:11

No Duplicates.

Comment 233 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Andrew
Last Name: Tuckman
Email Address: andrew.tuckman@visionrecycling.com
Affiliation: Compost Producer SF Bay Area

Subject: In Support of Organics & Compost
Comment:

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I urge the Air Resources Board to invest cap and trade proceeds in
the diversion of organic waste to bioenergy and composting to
support sustainable agriculture, which is critical to provide many
of the greenhouse gas reductions called for in the AB 32 Scoping
Plan and to alleviate environmental justice impacts. Whether we
know or not, Compost is part of our future.  Anaerobic digestion
and composting are at the nexus of the AB 32 Scoping Plan adopted
measures  where commercial organic wastes are diverted from
landfilling to generate renewable energy and negative carbon fuel,
resulting in  quality compost that is returned to sustainable
agriculture.
Thank you in advance!
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 14:46:45

No Duplicates.

Comment 234 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Shannon
Last Name: McDonald
Email Address: shannon.mcdonaldsclp@gmail.com
Affiliation: Sierra Club Loma Prieta

Subject: Investment plan for cap-and-trade revenues
Comment:

March 8, 2013

Shannon McDonald
Sustainable Land Use Committee Member
Sierra Club Loma Prieta Chapter
108 Park Pl #B
Capitola, CA 95010

RE: Investment plan for cap-and-trade auction revenues

Dear Chair Nichols,

As a sustainable land use advocate and cyclist I would like to express my strong support for the Sustainable Communities for All Proposals. I believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

I actively engage with communities in Santa Clara and San Mateo County to advocate and support sustainable land use projects. As a Sustainable Land Use Committee member of the Sierra Club Loma Prieta Chapter I support providing more transportation options and affordable housing.

I believe it is critical to build both homes and transit that are affordable and accessible to lower-income households, while supporting active transportation to improve health,. Just this week, the Census Bureau named the San Francisco area the nation's 'megacommuter" capitol - people who travel at least 50 miles an 90 minutes to work - with San Jose close behind. When people are priced out of homes near job centers and high-quality transit hubs, they must drive long distances to work.

According to a recent report by the California Housing Partnership Corporation, preserving and building affordable homes near transit will allow California to achieve the maximum VMT and GHG-reduction benefits of investment in transit infrastructure and transit-oriented development.

Sprawl and congestion are also bad for health - each additional hour spent in a car per day is associated with a 6 percent increase in the likelihood of obesity. Investing in safe bicycle and pedestrian infrastructure and programs like Safe Routes to School improves health in both urban and rural areas, and especially in

minority communities where pedestrians are significantly more likely to be killed by vehicles.

Investment like these will have the greatest impact on the communities most affected by climate change while also increasing access to opportunities.

Thank you for considering my comments,

Sincerely,

Shannon McDonald
Sustainable Land Use Committee Member
Sierra Club Loma Prieta Chapter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 14:56:26

No Duplicates.

Comment 235 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Paul
Last Name: Mason
Email Address: pmason@pacificforest.org
Affiliation:

Subject: Investment Plan Comments
Comment:

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Please see attached.
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Attachment: www.arb.ca.gov/lists/com-attach/263-2013investmentpln-ws-BnZUNAN2VVlXMAZk.pdf

Original File Name: PFT AB 32 Investment Auction Proceeds in Forests.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:30:39

No Duplicates.

Comment 236 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Lauren
Last Name: Michele
Email Address: lauren.michele@policyinmotion.com
Affiliation: TRANSPORTATION COALITION

Subject: TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES' PROPOSAL FOR INVESTMENT PLAN
Comment:

PLEASE SEE ATTACHED LETTER AND PROPOSAL FROM THE TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES

The Transportation Coalition for Livable Communities includes the California Transit Association, League of California Cities, California State Association of Counties, Sacramento Metropolitan Air Quality Management District, CALCOG, and major Metropolitan Planning Organizations including SACOG, MTC, SCAG, SANDAG and San Joaquin Valley Policy Council, as well as the Natural Resources Defense Council, California Alliance for Jobs, and Transportation California - in short, the agencies and institutions responsible for operating, maintaining, and advancing a sustainable transportation system in California.

The Coalition has developed a proposal to invest cap and trade revenue to address both the greenhouse gas reduction goals of AB 32 and critical transportation system needs identified in the California Transportation Commission’s Statewide Transportation Needs Assessment over the next ten years. Our uniting principle is that auction revenues derived from vehicle fuels should be used to fund transportation system needs in a way that achieves AB 32 objectives and builds on the framework of SB 375 and other GHG reduction strategies.

The proposal would allocate funds equitably to regional governments to establish a competitive grant process for local entities, under state criteria, to incentivize integrated strategies that combine land use changes with infrastructure investments at the neighborhood scale to achieve greatest long term greenhouse gas emission (GHG) benefits.

California faces a significant shortage in funds to maintain our existing transportation system, and lacks adequate funding to build an active transportation network. This proposal would provide funding for livable community investments to meet the challenges of increasing development in existing urban and developed areas to meet the requirements of SB 375. Further, it would fund GHG-reducing investments at the local level that implement regional Sustainable Communities Strategies within existing urbanized or developed areas – while also helping local governments meet critical sustainable transportation infrastructure and maintenance needs.

This approach of integrating livable community infrastructure, maintenance, and operations of the transportation system at the neighborhood scale will maximize GHG reductions from the transportation sector through combinations of strategies – rather than single purpose investments. This integrated approach achieves the most cost-effective results and support a range of community benefits – including public health, resource protection, affordable housing, equity, air quality, and safe routes to schools and other community services. It also would serve as a leverage to investments in rail modernization, interregional plans, and other funding mechanisms to encourage more sustainable growth and transportation infrastructure.

Unique among most proposals for state funding programs, the Transportation Coalition's proposal would stimulate local innovation and flexibility to get the greatest GHG reductions and best overall benefits for communities – while cost effectively meeting the goals of AB 32.

The proposal incentivizes combinations of transportation investments, including transit service and operating costs, road and bridge maintenance, retrofits for complete streets and urban greening, and clean technology infrastructure – all integrated with land use changes to achieve the maximum greenhouse gas emission reductions from the transportation sector.

This proposal is consistent with AB 32, SB 375, and the provisions of AB 1532 and SB 535 --- and most equitably and effectively meets the transportation and greenhouse gas emission reduction goals of the state and local communities. We request that this proposal be considered for inclusion in the Investment Plan.

Cap and trade revenue is public money resulting from the administration of AB 32, the Global Warming Solutions Act. It must be spent to implement that law. We believe the Transportation Coalition's proposal provides the most public and local community benefits while achieving the most cost effective implementation of AB 32.

For the first year Budget allocation we propose the state provide funding through the regions for planning and project development focused on this competitive and integrated approach to most effectively reduce greenhouse gases, meet our local and regional transportation needs, and revitalize our communities. Over the life of the program, we believe that allowance revenues related to motor vehicle fuels should be dedicated to reducing emissions from the transportation sector, with a major part of those funds allocated to this sustainable community funding program.

We have commissioned research to identify how to get the best results from such a program and have brought together the local governments and regional agencies responsible for administering our sustainable community programs to create a program concept that will most equitably and effectively achieve the state's short term and long term GHG reduction and sustainable community goals.

We want to work with CARB and the Administration to craft an effective strategy to achieve maximum GHG reductions and long term co-benefits under AB 32 by investing a major portion of revenues related to fuels in integrated transportation and land use strategies consistent with the SB 375, the California Regional Blueprint plans and other regional planning processes. We request

that the following concepts be considered for inclusion in the Investment Plan:

1. Auction revenue from fuels should implement the AB 32 regulatory program to reduce GHG emissions from transportation

2. Favor cost-effective and integrated transportation and land use strategies

3. Project funding determinations should be done primarily at regional level under statewide criteria for evaluating GHG impacts. Criteria for project selection should be uniform statewide and developed by the State of California. Regions shall administer competitive funding processes and select projects based on these criteria.

4. Allow flexibility at the regional and local level to develop most cost effective projects.

5. Assist local governments in meeting regional GHG reduction goals

6. Create performance-based approach to maximize regional flexibility with improved modeling and verification systems to ensure effective results

7. Promote innovation, collaboration, economic development and rural sustainability

8. Support co-benefits: air quality, public health, resource protection, equity, affordable housing, agriculture, and safety
We hope you will give us the opportunity to work with you to refine these concepts and take advantage of this opportunity to make AB 32 a key component of California’s transportation investment program.

Sincerely,

TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES
• California Transit Association
• Natural Resources Defense Council
• California State Association of Counties
• League of California Cities
• Self-Help Counties Coalition
• California Association of Councils of Governments
• Sacramento Area Council of Governments
• Southern California Association of Governments
• Metropolitan Transportation Commission
• San Diego Association of Governments
• San Joaquin Valley Regional Policy Council
• Transportation California
• California Alliance for Jobs
• Sacramento Metropolitan Air Quality Management District

Attachment: www.arb.ca.gov/lists/com-attach/264-2013investmentpln-ws-VTYAZwNwAzJXDlUm.pdf

Original File Name: CARB SUBMISSION_Transportation Coalition for Livable Communities Cover Letter and Proposal_03_08_13.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:04:09

No Duplicates.

Comment 237 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jayne
Last Name: Bauer
Email Address: jbauer@sta-snci.com
Affiliation: Solano Transportation Authority

Subject: Cap-and-Trade Auction Proceeds
Comment:

```
The Solano Transportation Authority submits its comments for how
Cap-and-Trade auction proceeds can support the greenhouse gas (GHG)
reductions goals of AB 32.
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Attachment: www.arb.ca.gov/lists/com-attach/265-2013investmentpln-ws-UCNRIwNjAAwHbQVx.pdf

Original File Name: STA Ltr. re ARB Cap-and-Trade Auction Proceeds.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:59:52

No Duplicates.

Comment 238 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeff
Last Name: Anderson
Email Address: jeff.anderson@calcef.org
Affiliation: CalCharge and CalCEF

Subject: CalCharge Comments - Use of Cap and Trade Auction Proceeds
Comment:

```
Attached please find comments from CalCharge on Proposed Uses for
the Cap and Trade Auction Proceeds.   If you have any questions or
require further information, please do not hesitate to contact me.

Best,

Jeff Anderson
Interim Executive Director - CalCharge
Managing Director - CalCEF
jeff.anderson@calcef.org
415-948-6365 (cell)
```

Attachment: www.arb.ca.gov/lists/com-attach/267-2013investmentpln-ws-B2QAZwNuADALZVAx.docx

Original File Name: Calcharge CARB comment Mar 8 .docx

Date and Time Comment Was Submitted: 2013-03-08 14:59:37

No Duplicates.

Comment 239 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Hilary
Last Name: Norton
Email Address: hnorton@tpgre.com
Affiliation: (FAST) Fixing Angelenos Stuck in Traffic

Subject: Testimony regarding use of Cap and Trade Fund Proceeds
Comment:

```
Attached as a PDF are FAST's written comments regarding use of Cap
and Trade funds for clean transportation uses such as bike share,
car share, and transit operation funds in order to reduce the 40%
of greenhouse gas emissions attributable to transportation.

I spoke as part of the MoveLA/Transform "Sustainable Communities
for All" coalition at the Los Angeles CARB hearing on February 27,
2013.

Thank you very much!

Hilary Norton
Executive Director

FAST - Fixing Angelenos Stuck in Traffic
515 South Flower Street, 6th Floor . Los Angeles, CA 90071
Telephone 213.233.2542 . Cellular 213.448.2900 . Fax 213.613.1903
www.fastla.org
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Attachment: www.arb.ca.gov/lists/com-attach/268-2013investmentpln-ws-B2FTNFUnBCMAWQNg.pdf

Original File Name: FAST CARB Testimony re Cap and Trade.2.27.2013.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:03:05

No Duplicates.

Comment 240 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Timothy
Last Name: Haines
Email Address: thaines@swc.org
Affiliation: State Water Contractors

Subject: SWC Comments on 2013 Investment Plan
Comment:

These comments are submitted by the State Water Contractors. The SWC is a non-profit, mutual benefit corporation organized under the laws of the State of California, comprised of 27 public agencies holding contracts to purchase water delivered by the State Water Resources Development System, otherwise known as the State Water Project (“SWP”), which is owned and operated by the California Department of Water Resources (“DWR”). SWC’s public agency members are the beneficial users of the SWP, providing water for drinking, commercial, industrial, and agricultural purposes to a population of more than 20 million people and to over 750,000 acres of farmland throughout the San Francisco Bay Area, the Central Valley of California, and Southern California. The primary purpose of the SWP is to store and deliver water to the SWP Contractors, who pay all of its costs.

Attachment: www.arb.ca.gov/lists/com-attach/269-2013investmentpln-ws-ViVdLFMxADoFbQN1.pdf

Original File Name: SWCInvestmentPlanComments.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:02:55

No Duplicates.

Comment 241 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Lauren
Last Name: Michele
Email Address: info@transfunding.org
Affiliation:

Subject: STATEWIDE SUPPORT LETTER :: TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES' PROPOSAL
Comment:

PLEASE SEE ATTACHED STATEWIDE SUPPORT LETTER FOR THE TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES FUNDING PROPOSAL

Re: Support for Transportation Coalition Proposal in Cap and Trade Investment Plan

Dear Chairperson Nichols:

Over 60 organizations from across the state -- ranging from transportation and rail agencies to business and environmental groups – are writing in support of the proposal submitted by the Transportation Coalition for Livable Communities. This proposal would allocate funds equitably to regional governments to establish a competitive grant process for local entities, under state criteria, to incentivize integrated strategies that combine land use changes with infrastructure investments at the neighborhood scale to achieve greatest long term greenhouse gas emission (GHG) benefits.

Unique from other funding proposals, the Transportation Coalition's proposal would stimulate local innovation and flexibility to get the greatest GHG reductions and best overall benefits for communities – while cost effectively meeting the goals of AB 32 and supporting co-benefits including: air quality, public health, resource protection, equity, affordable housing, agriculture, and safety.

This proposal integrates livable community infrastructure, maintenance, and operations of the transportation system to maximize GHG reductions from combinations of strategies – rather than single purpose investments. It also would serve as leverage to investments in rail modernization, interregional plans, and other funding mechanisms to encourage more sustainable growth and transportation infrastructure.

California faces a significant shortage in funds to maintain our existing transportation system, and lacks adequate funding to build an active transportation network. This proposal would provide funding for livable community investments to meet the challenges of increasing development in existing urban and developed areas to meet the requirements of SB 375. This proposal would fund GHG-reducing investments at the local level that implement regional Sustainable Communities Strategies within existing urbanized or

developed areas – while also helping local governments meet critical sustainable transportation infrastructure and maintenance needs.

We support the Transportation Coalition’s proposal for combinations of transportation investments, including: transit service, operating, and maintenance costs; road and bridge maintenance; retrofits for complete streets and urban greening; and clean technology infrastructure – all integrated with land use changes to achieve the maximum greenhouse gas emission reductions from the transportation sector.

This proposal is consistent with AB 32, SB 375, and the provisions of AB 1532 and SB 535 --- and most equitably and effectively meets the transportation and greenhouse gas emission reduction goals of the state and local communities. We request that this proposal be considered for inclusion in the Investment Plan.

Cap and trade revenue is public money resulting from the administration of AB 32, the Global Warming Solutions Act. It must be spent to implement that law. We believe the Transportation Coalition's proposal provides the most public and local community benefits while achieving the most cost effective implementation of AB 32.

Thank you for your consideration to include funding for this proposal in the AB 32 Investment Plan.
Sincerely,

~Transit Agencies~
Capitol Corridor Joint Powers Authority
San Francisco Bay Area Rapid Transit District
Livermore Amador Valley Transit Authority
San Mateo County Transit District
Victor Valley Transit Authority
OmniTrans - San Bernardino Valley
Santa Cruz Metropolitan Transit District
California Transit Association*

~Northern California Agencies~
Santa Clara Valley Transportation Authority
Humboldt County Association of Governments
Placer County Transportation Planning Agency
Shasta Regional Transportation Agency
City of Sacramento
City of Davis
County of Marin
County of Santa Clara
County of Sacramento
County of Napa
Napa County Transportation and Planning Agency
Napa Valley Transportation Authority
Sonoma County Transportation Authority
Sonoma County Regional Climate Protection Authority
Alameda County Transportation Commission
Sacramento Area Council of Governments*
Metropolitan Transportation Commission*
Sacramento Metropolitan Air Quality Management District*

~Central Coast Agencies~
Transportation Agency for Monterey County

Santa Cruz County Regional Transportation Commission
San Luis Obispo Council of Governments
County of Monterey

~San Joaquin Valley Agencies~
Kern Council of Governments
Merced County Association of Governments
Madera County Transportation Commission
County of Stanislaus
San Joaquin Valley Regional Policy Council*

~Southern California Agencies~
County of San Bernardino
Western Riverside Council of Governments
San Diego Council of Governments*
Southern California Association of Governments*

~Business & Group Associations~
United Contractors
Bay Area Council
Urban Counties Caucus
Teichert
California Alliance for Jobs*
Transportation California*
California State Association of Counties*
League of California Cities*
Self-Help Counties Coalition*
California Association of Councils of Governments*

~Non-Profits & Individual Support~
Local Government Commission
WALKSacramento
Sonoma County Bicycle Coalition
Richmond SPOKES
California Urban Forests Council
Sacramento Tree Foundation
Sustainable Napa County
Met Sacramento High School
Cobblestone Placemaking
Marlon Boarnet, Director of Graduate Programs in Planning and Development, University of Southern California
Natural Resources Defense Council*

*Indicates Transportation Coalition for Livable Communities Member Organization

Attachment: www.arb.ca.gov/lists/com-attach/270-2013investmentpln-ws-USJRI1c3ACcAY1Ui.pdf

Original File Name: Statewide Support Letter and Logos_Transportation Coalition for Livable Communities_CARB Submission_03_08_13.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:05:46

No Duplicates.

Comment 242 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joseph T.
Last Name: Edmiston
Email Address: cartelli@smmc.ca.gov
Affiliation: Santa Monica Mountains Conservancy

Subject: Investment of AB 32 Auction Proceeds in Natural Resources Through State Conservancies
Comment:

```
Please see the attached letter urging the California Air Resources
Board and the Administration to include natural resource protection
in the initial AB 32 cap and trade investment plan, and to
specifically designate State Conservancies as Implementing Entities
for investment funds.

Thank you,

Joseph T. Edmiston, FAICP, Hon. ASLA
Executive Director
Santa Monica Mountains Conservancy
```

Attachment: www.arb.ca.gov/lists/com-attach/271-2013investmentpln-ws-VCdSOQRoVmYDWgQp.pdf

Original File Name: SMMC - Cap and Trade Comment Letter - 03 08 2013 (4).pdf

Date and Time Comment Was Submitted: 2013-03-08 14:48:15

No Duplicates.

Comment 243 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Allen
Last Name: Young
Email Address: allen-young@metsacramento.org
Affiliation:

Subject: MET SACRAMENTO HIGH SCHOOL SUPPORT :: TRANSPORTATION COALITION FUNDING PROPOSAL
Comment:

PLEASE SEE ATTACHED LETTER FROM THE MET SACRAMENTO HIGH SCHOOL FOR SUPPORT OF THE TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES FUNDING PROPOSAL

Re: Support for Transportation Coalition Proposal in Cap and Trade Investment Plan

Over 100 students at the Met Sacramento High School are writing in support of the proposal submitted by the Transportation Coalition for Livable Communities to provide funding for the kinds of sustainable community improvements students need to get from home, to school, and within our neighborhoods.

The Met Sacramento High School is a dependent public charter high school located in downtown Sacramento. Students participate in internships throughout the urban core of Sacramento and rely on public transit, bicycle lanes, and walkable streets. Many students take classes at Sac City College and rely on transportation to get between our high school and college classes. In short, Metsters travel A LOT.

Of the nearly 300 students at the Met, 100 bike to school and related internships in the community – less than a dozen are licenced drivers. We even created a student-run bicycle collective in its own room at school made possible in part by a state grant to make our school LEED and CHIPS certified for energy efficiency – now students have a place to fix their bikes and help each other. And our school itself is a more enjoyable and cool place to hang out.
Our school worked with the City and County of Sacramento in collaborating on innovative ways to make our school more energy efficiency -- and a grant program like the one proposed by the Transportation Coalition for Livable Communities could make our school safer to walk, bike, and take transit to.

If we want people to live, work and play in existing developed areas we need to make our infrastructure better around community schools and the parks and places that students to go.
As students who go to a school in an urban core, we enjoy being able to walk to parks, bike to coffeehouses, and take transit to our internships and community service activities – but we would like to be able to do this safely and enjoy the experience with the needed infrastructure to make our travels better and to improve

other communities that aren't as fortunate as we are to have.

The Transportation Coalition for Livable Communities has a proposal that would create local competitive grants under regional governments to encourage innovative ways of combining all aspects of a livable community: better bike facilities, smooth roads, frequent and predictable transit, clean technology infrastructure, rail improvements, streetscape enhancements, traffic calming, multi-use paths, underground utilities, and urban greening.

The Transportation Coalition's proposed program would encourage local governments to work together with other organizations like schools and parks to be more competitive when applying for grant money for integrated transportation and land use investments that meet regional greenhouse gas reduction goals.

The proposal would also allow local governments to be more innovative in working with schools in order to make walkable and bikeable communities a reality – and to better plan for community schools in community cores where much of California's future population is expected to live.

Funding to support safe infrastructure, programs and plans at schools are far below the demand. We urge you to include the proposed program concept from the Transportation Coalition for Livable Communities.

Sincerely,

OVER 100 STUDENTS OF THE MET SACRAMENTO HIGH SCHOOL

Allen Young
Principal

Attachment: www.arb.ca.gov/lists/com-attach/272-2013investmentpln-ws-Am9WNQN2AAwFcAlo.pdf

Original File Name: Met Sacramento High School Support_Transportation Coalition for Livable Communities.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:17:33

No Duplicates.

Comment 244 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joyce
Last Name: Roy
Email Address: joyceroy@earthlink.net
Affiliation:

Subject: Updates to the Zero-Emission Bus Regulations
Comment:

```
The Cap & Trade funds should all be used to cut Green House Gases.
A most appropriate use would be for the development of affordable
housing near transit so people will not have to drive till they
qualify.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 15:24:00

No Duplicates.

Comment 245 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Gary
Last Name: Toebben
Email Address: flopez@lachamber.com
Affiliation: Los Angeles Area Chamber of Commerce

Subject: Cap-and-Trade Auction Proceeds Investment Plan Principals and Recommendations
Comment:

```
Please see the attached document for the Los Angeles Area Chamber
of Commerce's comments on the cap-and-trade auction proceeds
investment plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/274-2013investmentpln-ws-W2gAKFJrBXgLPFRn.pdf

Original File Name: 3.8.13_LA_Chamber_Cap_and_Trade_Investment_Plan_Comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:23:54

No Duplicates.

Comment 246 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ann
Last Name: Hancock
Email Address: ann@climateprotectioncampaign.org
Affiliation: Climate Protection Campaign

Subject: Comment Letter on Cap & Trade Auction Investment Plan
Comment:

Response to ARB Request for Public Input on Cap-and Trade Auction Proceeds Investment Plan

Thank you for this opportunity to comment. Our comments address two major topics, dividends and investment.

Dividends – The Best Use of Proceeds

Since 2006 when our organization became involved with AB32 Implementation, we have consistently encouraged the California Air Resources Board (ARB) to auction allowances to upstream emitters, include a rising price floor, and return auction proceeds to the public as dividends. Returning auction proceeds to the public on a per-capita basis as dividends following the Alaska Permanent Fund model is the best use of revenues under the AB32 cap-and-trade program.

Benefits of dividends are:
• Making Californians whole – AB32 revenues don't materialize out of thin air. Ultimately they come from Californians paying higher prices.
• Addressing equity – Economic analyses project that about 80% of Californians will come out ahead with dividends, and that those in the lower economic brackets benefit proportionately more. Thus, dividends help meet the SB535 requirement that the investment plan allocate a minimum of 25% of revenue to projects that provide benefits to disadvantaged communities and a minimum of 10 percent of the available moneys to projects located within such communities.
• Building durable support for California's bold climate protection legislation. When Californians receive their climate dividend and a ka-ching in their bank account, they will directly experience the benefit to them of climate protection.

Dividends accomplish the AB32 goals relating to equity, and maximizing additional environmental, economic, and overall societal benefits.

The AB32 Economic and Allocations Advisory Committee recommended that "the largest share (roughly 75%) of allowance value should be returned to California households… through lump-sum payments…" and "roughly 25% of this value used to finance socially beneficial investments and other public expenditures."

The California Public Utilities Commission recently adopted a climate dividend policy for revenue generated in the electricity sector. In announcing its decision, the Commission wrote, “Returning revenues equally to all residential customers is more equitable and comports with the idea of common ownership of the atmosphere given that residential ratepayers will ultimately bear the increased costs as a result of the Cap-and-Trade program.”

The need for dividends will become more pronounced in California in 2015 when the transportation sector enters the program. Consumers will feel more pain in their wallets and lives from higher fossil fuel prices. The best way to defuse a potential political backlash is to give Californians a dividend and make them whole.

The State of California is desperate for revenue. But so are the people of California. The good news for the State is if it is done in the right order, both will benefit if the money is sent directly to the people with dividends, and dividends are made taxable. This would result in a portion of funds coming back to the State through taxes, and those funds would now be free of the Sinclair restrictions.

However, if the money is spent on programs first, then the public will see climate change as one more budget item, floating in a sea of eroding social services. The State can still seize this prime opportunity to create a revenue-neutral program that reimburses the public for their share of revenues from the Commons. At the same time, it would create a new psychological, economic, justice framework for understanding that the solution to climate change is a carbon price that rewards the people of California. The Investment Plan can provide a template for national and international climate policy by providing equal dividends or shares to all Californians.

Although rebates are part of the adopted policy for the electricity sector, additional costs will be passed to consumers as additional sectors come under AB32. Electricity sector rebates will not compensate consumers for costs from transportation, and indirect costs from other goods and services that are passed through as energy costs rise. When the transportation sector enters the program in 2015, consumers will see a very visible hit to their pocketbooks. The best way to defuse a potential political backlash is to include a dividend for transportation sector and indirect costs in the Investment Plan.

Spending billions of dollars of revenues on infrastructure projects that offer long-term emission reductions but short term costs to taxpayers is a risky political gamble that could jeopardize the entire AB32 effort.

AB1532 Considerations

While dividends are not specifically named in AB1532 (Perez), the bill says that the Air Pollution Control Fund expenditures “may include” the categories named “but are not limited to” them, so dividends are still a viable option.

The State could fund research into dividend distribution and the potential for resulting behavioral change. For example, the State could fund an effort to determine how the California Public Utilities Commission can best accomplish its stated goal of moving from on-bill dividends toward off-bill dividends. The State could

pilot a debit card system, or work with existing debit card programs to assess how dividends could be best delivered at low cost to recipients. This may also include incorporating dividends from a future national carbon price or from other “feebate” programs.

Political Backlash If No Dividends
In 2009-10, Congress came close but ultimately failed to pass a climate bill. An in-depth analysis places blame on proponents’ insider game that failed to align stakeholders and failed to counter opponents who blasted the bill for foisting more costs onto citizens and businesses.

Excerpts of the analysis by Skocpol, author:
The cap and dividend approach makes it possible to speak with average citizens about what they might gain as well as pay during the transitional period of increasing prices for energy from carbon sources. Cap and dividend is simple to spell out and it is also relatively transparent. Citizens could understand and trust this policy. Like Social Security, taxes or proceeds from auctions are collected for a separate trust fund – and the revenues are used to pay for broadly valued benefits for each citizen and every family. No opaque, messy, corrupt insider deals. The dividend payments also deliver a relatively greater economic pay-off to the least-well off individuals and families, precisely the people who, as energy prices rise, would have to spend more of their incomes as home heating, electricity, and gasoline.

Popularly rooted organizations like labor unions, churches, and old people’s associations might rally behind such an approach, because it is economically just in its impact. Indeed, for some years after it started, a cap and dividend system would reduce the expanding income inequalities that have plagued American society and politics in recent decades. Environmentalism has a reputation for appealing mostly to white, upper-middle-class educated citizens, even as stagnating wages for less privileged Americans have made it easy for right-wing forces to demonize carbon-capping as a new tax that will burden already hard-pressed families. Cap and dividend would allow antiglobal warming advocates to say – loud and clear, and very truthfully – that promoting cleaner energy will also boost the economic fortunes of average Americans. Reformers who want to remake energy use in the United States need to deliver concrete economic help to ordinary families along the way, and ideally they should do it in easy-to-understand, transparent ways. (pgs. 125-126)

It may be tempting to ignore Skocpol’s political warnings given California’s current Democratic majority in the legislature. However, a program that spends most if not all funds on new government programs with few dividends may be quite vulnerable, especially if political winds shift.

The withdrawal of New Jersey from the Regional Greenhouse Gas Initiative (RGGI) is a cautionary tale for what could happen if allowance value is used for well-intentioned efficiency programs that are invisible to most consumers. Funds that were supposed to be set aside for energy and environmental uses were raided to plug state budget deficits. Because consumers did not see a direct connection to the use of revenues, the lack of consumer support failed to prevent New Jersey’s Governor from withdrawing his state from the program. A per capita dividend could help California avoid this fate.

Dividends are beginning to take a larger role in the national climate debate. A recent bill announced by Senators Barbara Boxer (D-CA) and Senator Bernie Sanders (I-VT) would impose an upstream fee on carbon emissions, with three-fifths of revenues refunded to residents as a Family Clean Energy Rebate. Republican Senator Susan Collins (R-ME) co-sponsored a bill called the CLEAR Act with Senator Maria Cantwell (D-WA) in 2009 that would have returned 75 percent of revenues to consumers as a dividend.

Climate change is a multi-decade, multi-generational challenge. Rather than spending revenues on projects that attract support from only one party, California needs a bi-partisan approach that attracts public support from non-environmental constituencies.

Investments

Challenges

As noted in the Draft Concept Paper, “One of the planning challenges is drafting an investment plan when the amount of auction proceeds to the State each year is unknown.” RGGI recently reduced its number of auctioned permits by 45 percent. The European Trading System (ETS) is proposing to withhold 1.4 billion permits due to an oversupply. Such ongoing fluctuations of supply and demand in a tradable permit system make it an inappropriate source of funding for long-term large-scale projects.

Multi-billion dollar infrastructure projects such as high-speed rail are problematic investments because they could easily swallow up all the revenues from cap and trade, yet still be unable to contribute significantly to the state’s GHG reduction goals by 2020. Investing solely in such projects will not broaden bipartisan public support for a continuously increasing price on carbon. Big projects will not counter the attack that a carbon price is a regressive tax.

Panelists at the May 24, 2012, ARB workshop on this topic expressed support for a long list of programs. Suggestions often conflicted as one speaker recommended focusing on "shovel ready" programs and the next on long-term research and development. The extensive laundry list of pet projects is a result of the perception that this is “free money” which can substitute for needs being de-funded by budget cuts.

Once politicians see revenues being spent, it will be tempting to borrow from those funds. What looks like free money to legislators will be a visible target for opponents to make the entire AB32 program vulnerable to an anti-tax backlash. High-speed rail is the most egregious of these, because the anticipated boondoggle attack would be tough to fight during the years or decades until it is fully operational.

Better sources of funding for investments in renewables and efficiency, exist including shifting fossil fuel subsidies or existing subsidies for activities that cause emissions. The transportation sector in California invests millions of dollars in policies and programs that increase fossil fuel use and GHGs, for example, parking structures, new highway lanes and widening roads. Such funds could go toward investments described in the Concept Paper, reserving auction proceeds for per capita dividends.

When choosing among these options, questions ARB should ask are:

• Are these investments already being made by other funding sources?
• Can investment opportunities be evaluated and selected using the amount of GHG reduction per dollar spent as a criterion? (We recommend that they are.)
• How will ARB's choices impact the potential renewal of the Public Good Charge that the Legislature let expire?
• How do these public funds relate to private sector investment for research or product development (i.e. Silicon Valley venture capital)?
• Will these funds choose technology winners and losers, or dissuade private firms from investing in R&D?

Positive Investment Opportunities
Using 25% for investment as the EAAC recommended, we offer the following to be prioritized.
1. Financing programs that leverage private capital. We distinguish financing from funding: Financing is a sustainable structure that enables access to funds currently spent on fossil fuels to efficiency and renewables; funding is a one-time allotment given by an external source for a program. Three financing programs that we have or are working on Sonoma County are:
• PACE – Property Assessed Clean Energy
• Pay As You Save - Using water bills to finance energy and water efficiency projects.
• Community Choice Aggregation –The most powerful measure under local control for reducing GHG emissions. One of the big first things we need is a state revolving loan fund to help communities launch local CCA programs.
2. Offering access to funds for non-profits like ours. Often funding opportunities exist for which non-profit organizations are ineligible despite a proven track record of development and implementation of innovative, effective solutions. Although our organization has largely driven Sonoma County climate protection activities and innovations since 2001, we often have to plead with local governments to apply for funds because only they are eligible.
3. Investment in innovation, research, and competitive grants for bold ventures. Transportation solutions are especially challenging. We strongly recommend investing in developing solutions that use pricing, one of the most effective measures to impact mobility choices. Other exemplary transportation programs that we are implementing in Sonoma County are:
• ECO2school - A high school service learning program that enables students to reduce the GHG emissions associated with the student commute. Participating schools have seen as much as a 21 percent GHG reduction.
• WeGo Ridesharing – A program that matches and incentivizes ridesharing using smartphone technology. We see a great opportunity for effective, local Transportation Demand Management programs that currently lack funding.

Please feel free to contact me about our comments or projects.

Sincerely,

Ann Hancock, Executive Director, Climate Protection Campaign

Attachment: www.arb.ca.gov/lists/com-attach/275-2013investmentpln-ws-

Uz8CYQZzUHcFZgJw.pdf

Original File Name: Letter Comment re AB32 revenues March 8 2013.pdf

Date and Time Comment Was Submitted: 2013-03-08 14:38:59

No Duplicates.

Comment 247 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: David
Last Name: Kutrosky, Director
Email Address: DavidK@capitolcorridor.org
Affiliation: CAPITOL CORRIDOR JOINT POWERS AUTHORITY

Subject: CAPITOL CORRIDOR SUPPORT LETTER :: TRANSPORTATION COALITION FUNDING PROPOSAL
Comment:

```
*PLEASE SEE ATTACHED LETTER OF SUPPORT FROM THE CAPITOL CORRIDOR
JOINT POWERS AUTHORITY OF THE TRANSPORTATION COALITION FOR LIVABLE
COMMUNITIES FUNDING PROPOSAL*
```

Attachment: www.arb.ca.gov/lists/com-attach/276-2013investmentpln-ws-UTIHYl02AiEAZ1AP.pdf

Original File Name: CCJPA Support_Transportation Coalition for Livable Communities.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:22:54

No Duplicates.

Comment 248 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kathy
Last Name: Cole
Email Address: kcole@mwdh2o.com
Affiliation: Metro Water of Southern California

Subject: MWD Comment Ltr re: Draft Concept Paper for Investment of Cap-And-Trade Auction Proceeds
Comment:

```
Attached is a letter dated March 8, 2013, from the Metropolitan
Water District of Southern California with comments on the Draft
Concept Paper for Investment of Cap-and-Trade Auction Proceeds.
```

Attachment: www.arb.ca.gov/lists/com-attach/277-2013investmentpln-ws-VTZQN1UmU2IGLQlq.pdf

Original File Name: CARB-CommentLetterClean030613.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:21:06

No Duplicates.

Comment 249 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joe
Last Name: Pirzynski, Chairpers
Email Address: Kurt.Evans@VTA.ORG
Affiliation: SANTA CLARA VALLEY TRANSPORTATION AUTHOR

Subject: SANTA CLARA VTA SUPPORT :: TRANSPORTATION COALITION FUNDING PROPOSAL
Comment:

```
*PLEASE SEE ATTACHED LETTER OF SUPPORT FROM THE SANTA CLARA VALLEY
TRANSPORTATION AUTHORITY FOR THE TRANSPORTATION COALITION FOR
LIVABLE COMMUNITIES FUNDING PROPOSAL*
```

Attachment: www.arb.ca.gov/lists/com-attach/278-2013investmentpln-ws-AXIGY1MkAyQDZAZZ.pdf

Original File Name: SCVTA Support_Transportation Coalition for Livable Communities.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:28:18

No Duplicates.

Comment 250 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Arleen
Last Name: Novotney
Email Address: anovotney@accesadmin.com
Affiliation:

Subject: ACCES Cap & Trade Investment Plan Proposal
Comment:

```
Please find our proposal attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/279-2013investmentpln-ws-BWYHYFMiUV1VJwR2.zip

Original File Name: Cap Trade Investment Plan ACCES Proposal 3-8-13 Revisions Final.zip

Date and Time Comment Was Submitted: 2013-03-08 15:14:13

No Duplicates.

Comment 251 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeffrey
Last Name: Mitchell
Email Address: jpmitchell@ucdavis.edu
Affiliation: Department of Plant Sciences, UC Davis

Subject: Conservation Agriculture Systems Innovation Center (CASI) AB32 Cap-and-Trade Proceeds Requ
Comment:

March 8, 2013

Dear Ms. Livingston,

Attached is a submission and request for an allocation from AB32 Cap-and-Trade Auction Proceeds to our Conservation Agriculture Systems Innovation (CASI) Center. Two of our members, Ron Harben of the California Association of Resource Conservation Districts, and John Diener, President of Red Rock Ranch in Five Points, CA, also presented verbal testimony on behalf of our request at the Fresno public workshop that was held on February 19, 2013. Another CASI member, Fritz Durst, of Woodland, CA, tried to present verbal testimony at the February 25, 2013 public meeting in Sacramento, however, due to the overflow crowd at that meeting, he was unable to do so. His written testimony is included here with our submission.

We believe that our proposal provides an important program and rationale for reducing agriculturally-generated greenhouse gasses through the increased adoption of conservation agriculture systems. We would be very happy to discuss our proposal with you further at any time.

Sincerely,

Jeff Mitchell

Attachment: www.arb.ca.gov/lists/com-attach/280-2013investmentpln-ws-VjVdOlclBT8ANAg4.pdf

Original File Name: CASI2013AB32Submittal.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:19:23

No Duplicates.

Comment 252 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joseph
Last Name: Mount
Email Address: josephmount@comcast.net
Affiliation: AWS/ Con10u2Farm

Subject: 2013 investment-ws
Comment:

```
At the work shop in Sacramento , we heard lot from what I would
call old school
investment plans (Transportion ,Forestry, and Parks.) Vary little
opportunity was given to newer Technologies  such has (Aquaponics
or Hydroponics Greenhouse Farming and Atmospheric Water Generators
which makes water from the air.WE also have Edible Parks and Edible
Libraries.

         WHEN WILL WE HAVE AN OPPORTUNITY TO SHOW HOW  WE CAN

          CLEAN THE AIR,  CREATE JOBS , AND EDUCATE THE
COMMUNITIES

         ON HEALTHY FOODS!!
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 14:54:36

No Duplicates.

Comment 253 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Judy
Last Name: Arnold
Email Address: CTackabery@marincounty.org
Affiliation: MARIN COUNTY BOARD OF SUPERVISORS

Subject: MARIN COUNTY SUPPORT :: TRANSPORTATION COALITION FUNDING PROPOSAL
Comment:

```
*PLEASE SEE ATTACHED LETTER OF SUPPORT FROM THE COUNTY OF MARIN FOR
THE TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES FUNDING
PROPOSAL*
```

Attachment: www.arb.ca.gov/lists/com-attach/282-2013investmentpln-ws-UD1TNFwvWWMDawFe.pdf

Original File Name: Marin County Support_Transportation Coalition for Livable Communities.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:31:37

No Duplicates.

Comment 254 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Christopher
Last Name: Lee
Email Address: clee@yolocounty.org
Affiliation: County of Yolo

Subject: Yolo County BOS Comments
Comment:

```
Please find attached the comments of the Yolo County Board of
Supervisors on the cap-and-trade auction proceeds investment plan
draft concept paper.
```

Attachment: www.arb.ca.gov/lists/com-attach/283-2013investmentpln-ws-USgAaVwxVGhXDgFi.pdf

Original File Name: Yolo County BOS cap-and-trade investment ltr Nichols 03.08.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:33:05

No Duplicates.

Comment 255 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Gary
Last Name: Gero
Email Address: gary@climateactionreserve.org
Affiliation: Climate Action Reserve

Subject: Climate Action Reserve comments on investment of auction proceeds
Comment:

```
Thank you for this opportunity to comment. Our letter is attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/284-2013investmentpln-ws-UTJQOlM7BDoBZgl9.pdf

Original File Name: Climate Action Reserve Auction Revenue Letter.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:36:31

No Duplicates.

Comment 256 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Brian
Last Name: Drayton
Email Address: nairb1969@gmail.com
Affiliation: RICHMOND SPOKES

Subject: RICHMOND SPOKES SUPPORT :: TRANSPORTATION COALITION FUNDING PROPOSAL
Comment:

PLEASE SEE ATTACHED LETTER OF SUPPORT FROM RICHMOND SPOKES FOR THE TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES FUNDING PROPOSAL

Richmond Spokes – an entrepreneurial youth training program located in Richmond, California -- is writing in support of the proposal submitted by the Transportation Coalition for Livable Communities. Through Education, Empowerment, Employment, and Engagement, Richmond Spokes encourages self-sufficiency, job skill training, educational opportunities, and a culture of stewards who use cycling and sustainable transportation to enable physical, personal, and professional mobility.

Attachment: www.arb.ca.gov/lists/com-attach/285-2013investmentpln-ws-UiBcM1MxAzgFbghn.pdf

Original File Name: Richmond SPOKES Support_Transportation Coalition for Livable Communities.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:35:44

No Duplicates.

Comment 257 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jenny
Last Name: Bard
Email Address: jenny.bard@lung.org
Affiliation:

Subject: Health organization recommendations for cap and trade revenues
Comment:

```
Attached please find our letter from 21 health organizations
outlining recommendations for the allocations of cap and trade
revenues.
Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/286-2013investmentpln-ws-AWJWMVMiVFhQN1Q6.pdf

Original File Name: Cap and Trade Public Health Allocation Letter.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:38:57

No Duplicates.

Comment 258 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Steve
Last Name: Chadima
Email Address: schadima@aee.net
Affiliation: Advanced Energy Economy

Subject: AEE comments on Investment Plan
Comment:

```
Comments prepared by Advanced Energy Economy on the cap and trade
investment plan.
```

Attachment: www.arb.ca.gov/lists/com-attach/287-2013investmentpln-ws-AWBWNVE1BAgLbgJt.pdf

Original File Name: AEE Comments 3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:36:31

No Duplicates.

Comment 259 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Eileen
Last Name: Tutt
Email Address: eileen@caletc.com
Affiliation: CalETC

Subject: Cap-and-Trade Auction Revenue Investment Plan
Comment:

```
Please consider our comments in the attached file
thank you
```

Attachment: www.arb.ca.gov/lists/com-attach/288-2013investmentpln-ws-AmEAZ1Q5UmRSIANg.pdf

Original File Name: CALETC Comments on Cap-and-trade auction revenue investment plan Final.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:40:05

No Duplicates.

Comment 260 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Adam
Last Name: Link
Email Address: alink@casaweb.org
Affiliation: CA Association of Sanitation Agencies

Subject: Comments on Behalf of CA Association of Sanitation Agencies
Comment:

```
Please find attached comments of the California Association of
Sanitation Agencies. Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/289-2013investmentpln-ws-UWFUYVxzBWZQbgkn.pdf

Original File Name: 03.08.2013 M Nicoles Comments on Concept Paper.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:42:32

No Duplicates.

Comment 261 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Katie
Last Name: Stevens
Email Address: katie.stevens@fresno.gov
Affiliation:

Subject: City of Fresno Comments on Draft Concept Paper on Cap-and-Trade Auction Proceeds Plan
Comment:

```
Thank you for your consideration of the attached comments from the
City of Fresno.  Please don't hesitate to contact us should there
be any problems with the attachment.
```

Attachment: www.arb.ca.gov/lists/com-attach/290-2013investmentpln-ws-U2AAK11kBHoEMwAz.pdf

Original File Name: 3-8-13_ARB_Comments on Draft Concept Paper for AB 32 Auction Proceeds.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:43:57

No Duplicates.

Comment 262 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joseph
Last Name: Steinberger
Email Address: steinbergers@att.net
Affiliation: Walk SF

Subject: Investment Plan for Cap-and-Trade Auction Revenues
Comment:

Dear Chair Nichols:

As a transit rider, affordable housing advocate and cyclist I would like to express my strong support for the Sustainable Communities for All Proposal. I believe the vision of SB 375 can be achieved equitably and efficiently by providing transportation and housing choices that allow Californians to drive less and reduce household costs, especially for low-income households.

I am an environmental planner with approximately 25 years experience and I believe the Sustainable Communities for All Proposal provides a balanced and equitable solution to meeting the many legislative requirements in regards to reducing greenhouse gas emissions.

I believe it is critical to build both homes and transit that are affordable and accessible to lower-income households, while supporting active transportation to improve health. Just this week, the Census Bureau named the San Francisco area the nation's "megacommuter" capitol - peopole who travel at least 50 miles and 90 minutes to work - with San Jose close behind. When peopole are priced out of homes near job centers and high-quality transit hubs, they must drive long distances to work.

Accoring to a recent report by the California Housing Partnership Corporation, preserving and building affordable homes near transit will allow California to achieve the maximum VMT and GHG-reduction beneftis of investment in tranist infrastructure and tranit-oriented development.

Sprawl and congestion are also bad for health - each additional hour spent in a car per day is assocated with a 6 percent increase in the likelihoood of obesity. Investing in safe bicycle and pedestrain infrastructure and programs like Safe Routes to School improves health in both urban and rural areas, and especcially in minority communities where pedestrians are significantly more likelly to be killed by vehicles.

Investments like these will have the greatest impact on the communitities most affected by climate change while also increasing access to opportunitites.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 15:24:41

No Duplicates.

Comment 263 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeri
Last Name: Gill
Email Address: Jeri@SustainableNapaCounty.org
Affiliation: Sustainable Napa County

Subject: Cap and Trade Auction Proceeds Investment Plan
Comment:

```
Attached are comments and recommendations from Sustainable Napa
County.

Sincerely,

Jeri Gill
```

Attachment: www.arb.ca.gov/lists/com-attach/292-2013investmentpln-ws-VSZUPFQ2Aw8GY1Iz.pdf

Original File Name: SNC Cap and Trade Proceeds Comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:44:44

No Duplicates.

Comment 264 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michele
Last Name: Young
Email Address: Michele.Young@sanjoseca.gov
Affiliation: California Organics Recycling Council

Subject: Bioenergy and Composting to support Sustainable Agriculture
Comment:

The California Organics Recycling Council (CORC) membership been instrumental in our state's efforts to attain the recycling mandate of 50% waste diversion from landfills, required by the California Integrated Waste Management Act of 1989 (AB 939), and will remain critical to the attainment of future sustainable goals of 75% recycling and zero waste, and the implementation of AB 32. CORC fully supports the AB 939 statutory hierarchy of reducing, recycling, and composting. CORC has been supportive and engaged throughout the AB 32 Scoping Plan development and implementation process. Anaerobic digestion and composting are at the nexus of the AB 32 Scoping Plan adopted measures where organic wastes are diverted from landfilling to generate renewable energy and carbon negative fuel, and where quality organic compost is produced and returned to sustainable agriculture.
Specifically, CRRA has recommended investments in the following:

- Sustainable Agriculture Investment: Organic Compost Use Fund
- Compost Investment: Emission Reduction Credit Reimbursement (ERC) Fund
- Compost Investment: BACT Compost Technology Incentive Payment
- Biomethane Investment: Food Waste to Anaerobic Digestion Technology Incentive Payment
- Reauthorization of AB 118

Attachment: www.arb.ca.gov/lists/com-attach/293-2013investmentpln-ws-BmVSOwBzWGgDWghp.pdf

Original File Name: CORC Allocation of Cap & Trade Proceeds Comments - 3_8.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:20:48

No Duplicates.

Comment 265 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tad
Last Name: Mason
Email Address: tmason@sbcglobal.net
Affiliation:

Subject: Comments on ARB Cap&Trade Auction Proceeds Investment Plan
Comment:

```
Attached is a joint comment letter from the Northern California
Society of American Foresters, Placer County Air Pollution Control
District and the California Licensed Foresters Association.

Regards,

Tad Mason
```

Attachment: www.arb.ca.gov/lists/com-attach/294-2013investmentpln-ws-WipUMQFhACMAZQdj.pdf

Original File Name: pcapcd_norcalsaf-clfacap_trad_auct_revenue_comment 20130308.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:43:50

No Duplicates.

Comment 266 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Chris
Last Name: Mertens
Email Address: chris@csgcalifornia.com
Affiliation:

Subject: Clean Energy Working Group - Comments on Auction Revenue Proceeds
Comment:

```
Please find the attached comments of the Clean Energy Working Group
on Auction Revenue Proceeds.
```

Attachment: www.arb.ca.gov/lists/com-attach/295-2013investmentpln-ws-UzAGbANnU2ELYwZZ.pdf

Original File Name: Clean energy working group - Investment Plan comments to CARB.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:51:27

No Duplicates.

Comment 267 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeremy
Last Name: Waen
Email Address: jwaen@marinenergy.com
Affiliation: Marin Energy Authority

Subject: Use C&T Auction Proceeds to Support Green CCAs
Comment:

```
Please see the attached document for MEA's full comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/296-2013investmentpln-ws-V2dWYwYqAGNWaAEs.pdf

Original File Name: 03-08-13 MEA to CARB Public Comment - Final.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:56:45

No Duplicates.

Comment 268 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Peter
Last Name: Rodgers
Email Address: prodgers@slocog.org
Affiliation: SLOCOG

Subject: Coast Daylight train service
Comment:

```
Sir/Madame

Please see attached letter and concept paper regarding the Cosst
Daylight train service for Cap and Trade proceeds.

Pete Rodgers
```

Attachment: www.arb.ca.gov/lists/com-attach/297-2013investmentpln-ws-AWIHYFUkVFgEYwJs.pdf

Original File Name: Cap and Trade concept final.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:55:16

No Duplicates.

Comment 269 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

Comment 270 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Leonard
Last Name: Robinson
Email Address: EnviroBro@hotmail.com
Affiliation: California Black Chamber of Commerce

Subject: Cap & Trade Auction Proceeds Investment Strategy Comment
Comment:

```
Attached are the comments of the California blacl Chamber of
commerce and its partners.  The best way to achieve GHG reduction
in disadvanated ccommunitie is to actively engage the community.
```

Attachment: www.arb.ca.gov/lists/com-attach/299-2013investmentpln-ws-BWxTO1cgVGIBdAN3.docx

Original File Name: Investment Strategies Comments.docx

Date and Time Comment Was Submitted: 2013-03-08 15:56:05

No Duplicates.

Comment 271 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michael
Last Name: Marsh
Email Address: info@westernuniteddairymen.com
Affiliation: Western United Dairymen

Subject: Cap & Trade Proceeds Comment
Comment:

```
Please see attachment.
```

Attachment: www.arb.ca.gov/lists/com-attach/300-2013investmentpln-ws-ViEHZFQmVHMCYVIg.pdf

Original File Name: Western United cap & trade comment.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:45:07

No Duplicates.

Comment 272 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Edward
Last Name: Mainland
Email Address: emainland@comcast.net
Affiliation: Sustainable Novato

Subject: Funds to help CCAs get started
Comment:

Please consider using cap&trade auction revenues in part to support start-ups of Community Choice Electricity Aggregation (CCAs). This could take the form of a CCA Revolving Loan Fund, for example, or a number of other methods to help community-based, distributed, renewable power initiatives get off the ground. Once started, they can be great successes and put new muscle behind the Governor's goal of 12GW of distributed renewable power in the state. Marin County's CCA has been in operation for two years and is a big success, but it was difficult to get the finding for initial operations. Getting started is the big hurdle for communities to overcome. Start-up seed money from C&T revenues would be a terrific long-term shot in the arm for the solar industry and other businesses operating locally.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 16:00:32

No Duplicates.

Comment 273 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Garrett
Last Name: Fitzgerald
Email Address: gfitzgerald@oaklandnet.com
Affiliation: City of Oakland

Subject: City of Oakland comments on Cap-and-Trade Investment Plan
Comment:

```
Please find attached comments from the City of Oakland on the
Cap-and-Trade Auction Proceeds Investment Plan.

Please contact me with any questions. Thank you.

Garrett Fitzgerald
Sustainability Coordinator
Environmental Services Division
City of Oakland  |  Public Works Agency  |  APWA Accredited Agency
250 Frank H. Ogawa Plaza, Suite 5301  |  Oakland, CA  94612
(510) 238-6179
gfitzgerald@oaklandnet.com
```

Attachment: www.arb.ca.gov/lists/com-attach/302-2013investmentpln-ws-Am0HYFI4UG9WMQFv.pdf

Original File Name: Oakland comment letter on cap and trade investment plan 030813.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:05:19

No Duplicates.

Comment 274 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Wayne
Last Name: Chen
Email Address: wayne.chen@sanjoseca.gov
Affiliation: City of San Jose

Subject: City of San Jose Comment Letter on the Development of the Cap & Trade Investment Plan
Comment:

```
Thank you for considering the City of San Jose's input on the
development of the Cap & Trade investment plan.  Our comments are
contained in the attached letter.  We look forward to staying
engaged in this process.
```

Attachment: www.arb.ca.gov/lists/com-attach/303-2013investmentpln-ws-WjlVOlUgBy0GXwFu.pdf

Original File Name: City of San Jose_Comment Letter on Development of Investment Plan_Cap & Trade (3-8-2013).pdf

Date and Time Comment Was Submitted: 2013-03-08 16:08:12

No Duplicates.

Comment 275 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: RJ
Last Name: Cervantes
Email Address: rjcervantes@caltrux.org
Affiliation: California Trucking Association

Subject: CTA Cap & Trade Investment Plan Comments (Attached)
Comment:

```
CTA Cap & Trade Investment Plan Comments (File Uploaded)
```

Attachment: www.arb.ca.gov/lists/com-attach/304-2013investmentpln-ws-AWJSIARkWWlQN1Ul.pdf

Original File Name: CTACap-TradeInvestmentPlanComments.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:08:34

No Duplicates.

Comment 276 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Holly
Last Name: Jorgensen
Email Address: holly@sacriver.org
Affiliation: Sacramento River Watershed Program

Subject: Comments on the Development of an Investment Plan for the Cap and Trade Program
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/305-2013investmentpln-ws-WjtRNVZkBGVQCVIx.pdf

Original File Name: AB32 Comments_8Mar2013.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:12:10

No Duplicates.

Comment 277 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dan
Last Name: Noble
Email Address: danwyldernoble@gmail.com
Affiliation: Noble Resources Group, and ACP

Subject: Build of Framework and ROI for building high carbon soils
Comment:

As Executive Director of the Association of Compost Producers (www.healthsoilorg), I have been representing composters to expand the volume and value of compost to build healthy soils in California for over 10 years.

We support the use of these funds for organics recycling, and building high carbon soils, e.g. the California Organics Recycling Council (CORC) has submitted a separate letter that represents the perspectives of many California composters.

However, we noticed that we did not see a clear expression of how the money was going to be invested to specifically lower GHG. For this reason, we have attached a paper that recommends the following points for these Cap & Trade Proceeds. Specifically we recommend to:
1) Provide a Framework for Investing Cap-and-Trade Auction Proceeds
2) Report on ROI for each Investment
3) Balance “Direct” and “Indirect” Investments based on ROI effectiveness, and economic enhancement of communities of opportunity
We would like to discuss the specifics of these recommendations as you begin to engage in specific investments of these important funds.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 15:57:51

No Duplicates.

Comment 278 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Phoebe
Last Name: Seaton
Email Address: pseaton@crla.org
Affiliation: California Rural Legal Assistance, Inc.

Subject: CRLA comments to Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Please see attached document.

Thanks,

Phoebe Seaton
pseaton@crla.org

310-980-6494
```

Attachment: www.arb.ca.gov/lists/com-attach/307-2013investmentpln-ws-VDcAdARpAjADWlc0.pdf

Original File Name: crla comments to 2013 investment plan.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:14:53

No Duplicates.

Comment 279 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dan
Last Name: Noble
Email Address: danwyldernoble@gmail.com
Affiliation: Noble Resources Group, and ACP

Subject: Build of Framework and ROI for building high carbon soils
Comment:

As Executive Director of the Association of Compost Producers (www.healthsoilorg), I have been representing composters to expand the volume and value of compost to build healthy soils in California for over 10 years.

We support the use of these funds for organics recycling, and building high carbon soils, e.g. the California Organics Recycling Council (CORC) has submitted a separate letter that represents the perspectives of many California composters.

However, we noticed that we did not see a clear expression of how the money was going to be invested to specifically lower GHG. For this reason, we have attached a paper that recommends the following points for these Cap & Trade Proceeds. Specifically we recommend to:
1) Provide a Framework for Investing Cap-and-Trade Auction Proceeds
2) Report on ROI for each Investment
3) Balance “Direct” and “Indirect” Investments based on ROI effectiveness, and economic enhancement of communities of opportunity
We would like to discuss the specifics of these recommendations as you begin to engage in specific investments of these important funds.

Attachment: www.arb.ca.gov/lists/com-attach/308-2013investmentpln-ws-UTICZVIjVFhVJwFz.pdf

Original File Name: Cap&Trade Proceeds Investment Comments 3_8.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:57:51

No Duplicates.

Comment 280 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Christina
Last Name: Lokke
Email Address: christinal@csda.net
Affiliation: CSDA

Subject: Comments on the Cap-and-Trade Auction Proceeds Investment Plan
Comment:

```
Please see the attached letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/309-2013investmentpln-ws-VDcGc1A1AzFXDlc2.pdf

Original File Name: CSDA ARB Cap-and-Trade Auction Proceeds Investment Plan Comment Letter 3 8 13.pdf

Date and Time Comment Was Submitted: 2013-03-08 15:49:10

No Duplicates.

Comment 281 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Matt
Last Name: Schrap
Email Address: mschrap@crlease.com
Affiliation: Crossroads Equipment Lease & Finance

Subject: Proceeds Comments from Crossroads Finance
Comment:

March 8, 2013

TO: Mary Nichols, Chairperson, CARB

RE: Cap & Trade Auction Revenue for a Loan Assistance Program

Crossroads Equipment Lease and Finance is a California based nationwide heavy duty equipment lender. We specifically specialize in Heavy Duty Vehicle transactions for clean diesel, hybrid and alternative fuel equipment.

Although our portfolio spans the nation, we are proud to be a homegrown California company and recognize the unique regulatory and political challenges facing the transportation sector in this state. Crossroads has created specific programs to help commercial truck, bus and shuttle operators upgrade equipment to meet emission standards. In fact our efforts have helped fleets secure over $20 Million in grant and incentive funds for purchase of clean diesel, alternative fuel and near zero-emissions equipment.

Our experience in assisting end users has provided us with a unique perspective that has shaped our program development and product offerings. This experience has encouraged us to provide written comments and in-person testimony to respectfully encourage and request that you use auction revenue to create a loan guarantee program similar to the California Capital Access Program (CalCAP) but specifically to reduce GHG emissions from the transportation sector. CalCAP as well as the PLACE-DL program are highly successful loan assistance programs that have helped hundreds of fleets secure competitive financing for clean equipment across the state.

The program is simple, the state essentially provides a guarantee for a specific percentage of the financing amount for the equipment. This mitigates risk for the lender allowing for better terms, approvals for credit challenged customers or even potential equity in the equipment.

Using auction proceeds to create a loan guarantee program will open doors for end users to embark upon early adoption of zero or near zero emission equipment. Clean equipment deployment is vital to the Air Quality and GHG reduction goals of the Golden State. The largest challenge for end users is the high price tag associated with these types of equipment purchases. A loan program like CalCAP

could help lower this barrier to entry, especially for smaller, home-grown fleets operating in the trade corridors and local roadways in California.

Help us and companies like us, help fleets secure this equipment.

Please consider use of auction proceeds to fund a GHG specific loan reserve program for California based fleets.

Thank you for the opportunity to comment, we look forward to assisting in any way we can. Please feel free to contact me at the information below for any questions.

Sincerely,

Matt Schrap

VP Government Programs

Crossroads Equipment Finance

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 16:13:22

No Duplicates.

Comment 282 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jennifer
Last Name: Cohen
Email Address: cohenj@scrra.net
Affiliation: Metrolink

Subject: Metrolink Comments on Draft Concept Paper
Comment:

```
Please find attached comments from the Southern California Regional
Rail Authority (Metrolink) regarding the "Cap-and-Trade Auction
Proceeds Investment Plan Draft Concept Paper".
```

Attachment: www.arb.ca.gov/lists/com-attach/311-2013investmentpln-ws-U2ABWFJrAg4EM1Vm.pdf

Original File Name: 3_8_13 SCRRA Cap and Trade proceeds comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:14:03

No Duplicates.

Comment 283 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Cynthia
Last Name: Vitale
Email Address: cynthia@csgcalifornia.com
Affiliation: California Water Foundation

Subject: Strategic investments in the water sector to help achieve California's climate goals
Comment:

```
Please see attached letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/313-2013investmentpln-ws-VDdTIgBnAg5VPwRh.pdf

Original File Name: CWF Letter to CARB 3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:23:31

No Duplicates.

Comment 284 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michelle
Last Name: Passero
Email Address: mpassero@tnc.org
Affiliation: The Nature Conservancy

Subject: Investment Plan comments.
Comment:

```
Please accept these comments on the draft Investment Plan from The
Nature Conservancy.
```

Attachment: www.arb.ca.gov/lists/com-attach/315-2013investmentpln-ws-BXFdNQBiV21SOlAm.pdf

Original File Name: TNCInvestmentPlanCommentsfinal.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:15:23

No Duplicates.

Comment 285 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Alexander
Last Name: Helou
Email Address: alex.helou@lacity.org
Affiliation:

Subject: City of Los Angeles, Bureau of Sanitation Comments
Comment:

```
Hello,

      Please see the attached for comments from the City of Los
Angeles, Bureau of Sanitation.  Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/317-2013investmentpln-ws-AWJWOVUgAigGXwFu.pdf

Original File Name: City of Los Angeles, Bureau of Sanitation Letter.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:23:20

No Duplicates.

Comment 286 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Shawn
Last Name: Marshall
Email Address: shawnmarshall@LEANenergyus.org
Affiliation: LEAN Energy US

Subject: Cap & Trade Invesment in Community Choice Aggregation
Comment:

```
Dear Chair Nichol, Mr. Goldstene and ARB Staff,

Attached please find a letter and detailed proposal requesting
investment in a CCA revolving loan fund for the purpose of reducing
local greenhouse gas emmissions, accelerating energy efficiency and
distributed generation, and offering consumer energy choice at
competitive rates.

Thank you very much for your kind consideration of this proposal.
Please contact us if you have any questions or require further
information about CCA or the proposed loan fund.

All Best,
Shawn Marshall
Executive Director, LEAN Energy US
```

Attachment: www.arb.ca.gov/lists/com-attach/318-2013investmentpln-ws-VTlTMAFhBDlXfwFi.pdf

Original File Name: LEAN.CARB Cap&Trade.3.8.13.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:23:12

No Duplicates.

Comment 287 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Nancy
Last Name: Pfeffer
Email Address: nancy@networkpa.net
Affiliation: Gateway Cities Council of Govts

Subject: Comment on Cap and Trade Revenue Investment Plan
Comment:

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Please see attached letter in pdf format.
```

Attachment: www.arb.ca.gov/lists/com-attach/319-2013investmentpln-ws-VDlQNwR3VWVQPlIN.pdf

Original File Name: March 8, 2013 Calif Air Resources Board - Comment Ltr on Cap and Trade Investment Program.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:32:32

No Duplicates.

Comment 288 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Shannon
Last Name: Smith
Email Address: ssmith@pointcpartners.com
Affiliation:

Subject: Cap and Trade Auction Proceeds Investment Plan
Comment:

Thank you for the opportunity to comment on the Draft Concept Paper for the Cap and Trade Auction Proceeds Investment Plan.

With the passage of AB 32 and SB 375, California and ARB became the nation's pioneers in the pursuit of global warming solutions. Use some portion of the revenues to continue this forward thinking to advance technology and innovation. Here are some ideas:

• Set aside funds for a revolving loan fund, similar to TIFIA where public and private entities can fund and/or finance ghg-reducing activities.
• Set aside funds for angel investing. Funds could be awarded to pilot and demonstration projects or as seed funding to develop technology solutions. The State could be an investment partner and maintain some equity stake in the product or solution. Then use those royalties or proceeds to put back into the funding pot.
• Establish an idea lab, much like MIT's Idea Lab where new ideas and technology are given some funding, mentors, and a chance to develop.
• Incentivize the private sector, particularly as it relates to SB 375 activities. It seems only public investments in transit and other ghg-reducing activities get counted or measured, when the onus of this law falls upon the private sector. A reverse matching fund proposal where public funds match private funds in developing tools, systems, and mechanisms to reduce dependence on the private automobile.

Thank you and good luck!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 16:12:45

No Duplicates.

Comment 289 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Neil
Last Name: Edgar
Email Address: neil@edgarinc.org
Affiliation:

Subject: California Compost Coalition
Comment:

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Thank you for the opportunity to comment.
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Attachment: www.arb.ca.gov/lists/com-attach/321-2013investmentpln-ws-BWZVMFw+BAhQNQNi.pdf

Original File Name: CCC CARB Cap and Trade Comment Letter 030813.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:34:50

No Duplicates.

Comment 290 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Felicity
Last Name: Lyons
Email Address: flyons@housingca.org
Affiliation: Housing California

Subject: Comments on Investment Plan for Cap-and-Trade Auction Proceeds
Comment:

```
Submitted on behalf of the Sustainable Communities for All
Coalition and our proposal supporters.

Please see comment letter and two (2) enclosures attached as a zip
file.
```

Attachment: www.arb.ca.gov/lists/com-attach/322-2013investmentpln-ws-AnFTIFYkBSIBZlU8.zip

Original File Name: Sustainable Communities for All Comments and Attachments.zip

Date and Time Comment Was Submitted: 2013-03-08 16:32:50

No Duplicates.

Comment 291 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Cynthia
Last Name: Vitale
Email Address: cynthia@csgcalifornia.com
Affiliation: Conservation Strategy Group

Subject: Working Lands Coalition - Investing Auction Revenues in California's Working Lands
Comment:

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Please see attached documents.
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Attachment: www.arb.ca.gov/lists/com-attach/323-2013investmentpln-ws-UzJcKFEyAAxVP1Uw.zip

Original File Name: ARB Letters.zip

Date and Time Comment Was Submitted: 2013-03-08 16:40:28

No Duplicates.

Comment 292 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Nancy
Last Name: Scolari
Email Address: nancy@marinrcd.org
Affiliation: Marin Resource Conservation District

Subject: Marin RCD Ltr AB32 Recommendations
Comment:

```
Please accept our comments.
Thank you.
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Attachment: www.arb.ca.gov/lists/com-attach/324-2013investmentpln-ws-BmsAZ1IhWGILY1QL.pdf

Original File Name: Marin RCD ARB Rec Ltr 03-08-13.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:43:19

No Duplicates.

Comment 293 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Phoebe
Last Name: Seaton
Email Address: pseaton@crla.org
Affiliation: California Rural Legal Assistance, Inc.

Subject: c
Comment:

These comments were also submitted as an attachment.

March 8, 2013
VIA ELECTRONIC SUBMISSION

Ms. Shelby Livingston, Chief
Climate Change Program Planning and Management Branch
California Air Resources Board

Re: Cap-and-Trade-Auction Proceeds Investment Plan Draft Concept Paper

Dear Ms. Livingston:

California Rural Legal Assistance, Inc. (CRLA) submits the following comments on the Cap-and-Trade Auction Proceeds Investment Plan Draft Concept Paper issued by the California Department of Finance (DOF) pursuant to AB 1532 and SB 535. CRLA is a non-profit legal services organization that provides legal representation to low-income residents of rural California, including in many communities comprised primarily of farmworkers and their families.

The State of California, through implementation of the Cap and Trade Auction Proceeds Investment Plan (Investment Plan) must advance the goals laid out in AB 1532. These goals include not only the reduction of greenhouse gas (GHG) emissions, but also the stated aims of maximizing economic, environmental and public health benefits to the state; fostering job creation through green jobs; complementing efforts to improve air quality; and directing investment toward the most disadvantaged communities and households in the state. (Cal. Health and Safety Code Section 39712). We submit these comments to support the State’s efforts to administer the Investment Plan to further all of the goals identified by the legislature.

At the outset, we strongly encourage the Investment Plan to focus maximum resources on disadvantaged communities to further the goals of 1532 and other GHG emission reduction programs. To that end, while SB 535 identified a floor for investment in and for the benefit of disadvantaged communities of 10% and 25%, respectively, these numbers should in no way constitute a ceiling for investment in disadvantaged communities. We believe that the State should invest more than the statutory minimum levels in and for the benefit of disadvantaged communities. Doing so will not only better

achieve co-benefits of 1532, but also support the reduction of GHG emissions and create a stronger and healthier California. Furthermore, those funds earmarked to comply with SB 535 must specifically address the high priority needs of one or more disadvantaged communities, achieve measurable benefits for them, and deliver benefits that significantly outweigh any burdens that will fall on those communities.

The remainder of our comments will focus on the potential exclusion of several disadvantaged – primarily rural - communities from Cap-and-Trade auction proceeds and provide suggestions for programs and activities that will extend the benefits of AB 1532 to all Californians.

Exclusion of Rural Communities from Cap-and-Trade Auction Proceeds

Deficiencies in the CalEnviroScreen Tool

Senate Bill 535 directs the California Environmental Protection Agency (Cal EPA) to identify disadvantaged communities for purposes of the Investment Plan. Cal EPA, through the CalEnviroScreen has identified such communities by analyzing several environmental and demographic indicators. The Investment Plan anticipates targeting investments earmarked for disadvantaged communities to those communities identified as among the top 10% of disadvantaged communities (technically ZIP Code Tabulation Area, or ZTCAs) according to the CalEnviroScreen.

While we support the use of the CalEnviroScreen to identify disadvantaged communities for the purpose of SB 535 and AB 1532 implementation, we are concerned that the tool, due to significant identifiable gaps in the data used to calculate community scores, underestimates the environmental and socioeconomic burdens on certain communities, particularly rural communities. Due to this underestimation, the CalEnviroScreen excludes from the top 10% certain highly impacted communities that, in the presence of more robust data and a better-developed tool, would likely be included within that critical top 10% of highly impacted communities statewide.

If DOF defines “disadvantaged community” to mean only those communities that fall within the top 10 percentiles of the existing draft of CalEnviroScreen, communities that are inappropriately excluded from this threshold due to deficiencies in the tool will be excluded from consideration for critical resources. In recognition of flaws in the existing draft of CalEnviroScreen, we urge DOF to expand the definition of “disadvantaged communities” to those rural communities that score in the top 15% or 20% on the current draft of the CalEnviroScreen. If permissible under the statute, we also urge DOF to include as disadvantaged those communities that have a mean household income below 60% of State Median Income.

Failure to Capture Environmental Characteristics in Rural Communities

CRLA raised several of our concerns with respect to deficiencies in the most recent draft of CalEnviroScreen in comments to the Office of Environmental Health Hazards Assessment (OEHHA) on February 1,

2013. We have attached those comments hereto for your consideration. In summary, we are concerned that significant data gaps make the CalEnviroScreen less reliable in measuring environmental and population characteristics in rural areas as compared to urban areas, where data are frequently more robust. In particular, we are concerned that the following indicators fail to reflect existing conditions in rural areas of California:

• Air Quality: Ozone – potentially underestimates burden on rural areas due to inadequate air monitoring in rural areas
• Air Quality: PM 2.5 – potentially underestimates burden on rural areas due to inadequate air monitoring in rural areas, particularly in agricultural areas that experience unique PM exposures
• Asthma – use of Asthma-Related Emergency Departments data potentially underrepresents asthma prevalence in rural areas, where residents may be reluctant to access ED care except in the most severe circumstances due to distance from EDs and/or unavailability of MediCal-accepting EDs.
• Lack of drinking water quality indicator in existing draft – fails to represent a significant environmental health hazard impacting rural communities, many of which rely on private wells or small water systems rather than on well-resources municipal water systems.
• Lack of infrastructure indicator in existing draft – fails to represent significant environmental health and safety hazards posed by inadequate wastewater treatment, and dilapidated housing.

As a result of these deficiencies, we are concerned that several highly disadvantaged communities will be excluded from Cap-and-Trade Auction proceeds. Despite exhibiting demographic indicators demonstrating disadvantage and vulnerability (e.g. poverty levels) several rural cities and towns do not score in the top 10% of disadvantaged communities according the CalEnviroScreen due , we believe, to data deficiencies in rural areas. Some examples include Huron (99th percentile among ZTCAs based on poverty indicators, CanEnviroScreen score of 16-20%), San Joaquin (99th percentile based on poverty indicator, CalEnvrioScreen score of 11-15%), Mendota (98th percentile based on poverty indicator, CalEnviroScreen score of 16-20%), Avenal (97th percentile based on poverty indicator, CalEnviroScreen score of 36-40%), Dos Palos (90th percentile based on poverty indicator, CalEnviroScreen score of 11-16%). None of these communities, and many like them, will qualify for Cap-and-Trade Auction proceeds targeting disadvantaged communities.

Failure to Capture Environmental Threats on Tribal Lands

We are also concerned that many of the databases used in the CalEnviroScreen completely fail to capture significant environmental threats on tribal lands which are outside of the jurisdiction of California regulatory agencies but which abut, or even house, sizeable California communities comprised of non-tribal members who suffer the environmental health effects of threats such as hazardous waste treatment, tire recycling, closed-but-not-cleaned illegal dumps and untreated wastewater from mobilehome parks. This data deficiency is particularly relevant in the Eastern Coachella Valley, where small tracts of tribal lands are interspersed with non-tribal lands inhabited by California residents, mostly low-income farmworker families. The CalEnviroScreen’s failure to account for environmental hazards on tribal lands results in significant underrepresentation of the pollution burden on the communities of Mecca, Thermal, and Coachella. The following indicators fail to account for

environmental hazards on tribal lands that impact California communities:

- Cleanup Sites – EnviroStor database does not include hazards on tribal lands
- Solid Waste Sites and Facilities, and Hazardous Waste Facilities – EnviroStor and Solid Waste Information Systems databases do not include hazards on tribal lands
- Groundwater Threats – GeoTracker database does not include hazards on tribal lands

Deficiencies in Population Characteristics

The CalEnviroScreen relies on several demographic indicators as key factors in determining a community's "population characteristic," a component of its score for determining its eligibility as a disadvantaged community. These indicators include a poverty indicator, educational attainment, linguistic isolation and age of population. The CalEnviroScreen fails to fully and accurately capture demographic characteristics of rural communities due to data deficiencies, including significant Census undercounts (see CRLA comments to CalEnviroScreen, attached) and geographic units that fail to capture small, disadvantaged communities that are co-located in a ZIP Code Tabulation Area (ZTCA) with better resourced areas.

For example, ZTCA 95363 in Stanislaus County includes the incorporated city of Patterson along with several unincorporated communities including Grayson and Westley. Westley, according to Census data, has poverty levels of around 32%, compared to the ZTCA as a whole, with poverty rates of approximately 14%. Similar disparities exist for other CalEnviroScreen demographic indicators. As a result, the community of Westley exhibits an artificially low "population characteristic" on the CalEnviroScreen. The tool assigns the 95363 ZTCA to the 16-20% percentile, thus excluding Westley from Cap-and-Trade Auction proceeds targeted at disadvantaged communities. There are many other communities just like Westley.

In recognition of the risk of undercounting the vulnerability of communities such as Westley, the Office of Environmental Health Hazards Assessment (OEHHA) and the California Environmental Protection Agency (CalEPA) have committed to produce future iterations of the CalEnviroScreen at the much finer Census tract level, which would more accurately reflect the actual demographics of small, severely low-income communities that share a ZTCA with wealthier communities. Since even OEHHA and CalEPA recognize the current draft's potential for underrepresenting the local conditions of small disadvantaged communities due to the use of ZTCA rather than Census tract, we urge DOF to broaden its definition of "disadvantaged communities" in order to avoid inappropriately excluding communities that would almost certainly fall within the top 10 percentile of the CalEnviroScreen but for their proximity to wealthier communities.

In order to allow for full inclusion of those communities that the legislature intended to benefit with passage of AB 1532 and SB 535, re reiterate that DOF in its Investment Plan should broaden the definition of disadvantaged communities to include those rural communities that do not score in the top 10% of disadvantaged communities on the CanEnviroScreen due to data deficiencies.

Proposed Programs and Activities to Promote the Intent of AB 1532

To ensure that the benefits of AB 1532 and SB 535 reach all Californians, including Californians in rural Communities we propose the following eligible uses and preferences for funds:

Proposed Eligible Activities Should Include, but not be Limited to the Following:

1. Expand or improve public transit service, including transit and transportation programs for rural communities such as van pools, car share and carpool promotion programs, with significant funding for operations.
2. Expand bicycle and pedestrian networks, facilities, infrastructure and programs to promote additional use and safety and provide access to transit, schools, colleges, health center, and other essential services.
3. Provide discounted transit passes in low income communities.
4. Invest in energy efficiency improvements for residential structures, including multifamily rental homes, owner-occupied homes and mobile homes affordable to lower-income households.
5. Engage in planning and investment activities that promote mixed use development in low-income, rural communities, thereby reducing VMTs by increasing “access through proximity” to essential goods and services.
6. Invest in sustainable, basic infrastructure and services, including drinking water and wastewater services, in existing communities.
7. Support infill development in existing communities.
8. Develop employment and training programs that prepare low income residents for green jobs.

Preferences Should be Given to Projects and Programs That:

1. Avoid or mitigate the disproportionate impacts of environmental stressors on disadvantaged communities and households.
2. Provide or support workforce development and long-term job and economic growth for low-income and disadvantaged communities and households.
3. Improve public health by decreasing air pollution, improving drinking water quality, improving the safety of housing or transportation systems, improving access to essential services, or increasing use of active transportation.
4. Invest in existing communities and affordable housing opportunities low income people throughout California, including farmworkers in rural communities who support California’s critical agricultural industry.
5. Reduce racial and/or economic segregation.

A note of caution on tying AB 1532 investments to SB 375 implementation

While we support the development of programs and practices that reduce greenhouse gas emissions through sustainable community development, SB 375 implementation and with it the development of Sustainable Communities Strategies (SCS) in the Southern California Association of Governments (SCAG) region and currently in the San Joaquin Valley has thus far excluded low income, and in particular rural, communities from the co benefits of SB 375. Metropolitan Planning Organizations have directed resources to urban cores and larger metro areas to the detriment of low income, rural communities. In the SCAG region and thus far in the San Joaquin Valley, SCSs – in various stages of development and adoption – do not project infill, transportation improvements, and defined growth in the counties’ most impoverished existing communities, yet residents of these communities support the region’s agricultural

wealth and are in close proximity to agricultural jobs thereby contributing to low Vehicle Miles Traveled (VMT) targets for the regions. As such, prioritization should be given to projects that seek to develop and invest in sustainable planning for these communities to ensure that they benefit from smart growth and sustainable planning throughout the state despite their possible exclusion from Sustainable Communities Strategies. This would meet the State's goals of reducing GHGs, promoting public health, investing in disadvantaged communities and improving air quality.

* * *

Thank you for your kind consideration of these comments. Should you have any questions, please feel free to contact Phoebe Seaton at pseaton@crla.org.

Sincerely,

Phoebe Sarah Seaton
Attorney at Law

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 16:37:08

No Duplicates.

Comment 294 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Catherine
Last Name: Lyons
Email Address: clyons@bayareacouncil.org
Affiliation: Bay Area Council

Subject: Transportation Coalition Proposal for CARB Cap and Trade Investment Plan
Comment:

The Bay Area Council supports the proposal submitted by the Transportation Coalition for Livable Communities to provide funding for sustainable community strategies.

This proposal is consistent with AB 32, SB 375, and the provisions of AB 1532 and SB 535. We request that this proposal be considered for inclusion in the Investment Plan.

This proposal provides flexibility to local governments to meet their most critical sustainable transportation infrastructure and maintenance needs consistent with their regional Sustainable Community Strategy and greenhouse gas reduction goals. At the same time, it ensures cost effective achievement of the state's goal of reducing greenhouse gas emissions from transportation. California faces a significant shortage in funds to maintain our existing transportation system and provide the livable community investments needed to provide the development in existing urban and developed areas needed to meet the requirements of SB 375.

We support the Transportation Coalition’s proposal for combinations of transportation investments, including transit service and operating costs, road and bridge maintenance, retrofits for complete streets, and clean technology infrastructure – all integrated with land use changes to achieve the maximum greenhouse gas emission reductions from the transportation sector.

We believe the Transportation Coalition's proposal provides public and local community benefits while achieving the cost effective implementation of AB 32.

Thank you for your consideration to include funding for this proposal in the AB 32 Investment Plan.

Sincerely,

Catherine Lyons
Policy Manager
Bay Area Council

Attachment: www.arb.ca.gov/lists/com-attach/326-2013investmentpln-ws-UzFdOgBiAAwBZgNh.docx

Original File Name: BAC AB 32 Investment Plan Letter.docx

Date and Time Comment Was Submitted: 2013-03-08 15:48:29

No Duplicates.

Comment 295 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ryan
Last Name: Young
Email Address: ryany@greenlining.org
Affiliation: SB 535 Coalition

Subject: Comments on Concept Paper and Workshops
Comment:

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Please see attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/327-2013investmentpln-ws-VSYAZFEPAmQFMFRh.pdf

Original File Name: SB 535 Coalition Comments on Concept Paper and Workshops 03 08 13.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:37:41

No Duplicates.

Comment 296 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Bruce
Last Name: Ray
Email Address: bruce.ray@jm.com
Affiliation: Johns Manville

Subject: Johns Manville comments on CARB AB32 auction proceeds investment plan
Comment:

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Please see the attached letter from Johns. Manville
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Attachment: www.arb.ca.gov/lists/com-attach/329-2013investmentpln-ws-WjlTOlI+AjxVNgRq.pdf

Original File Name: Comments of Johns Manville on CARB AB32 investment plans; 3-8-2013.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:46:14

No Duplicates.

Comment 297 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ann
Last Name: Rojas-Cheatham
Email Address: arojascheatham@gmail.com
Affiliation: Community Health for Asian Americans

Subject: Nail Salon Women Greening Their Jobs and the Environment
Comment:

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Please see attachment
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Attachment: www.arb.ca.gov/lists/com-attach/330-2013investmentpln-ws-UzBcO1cmWFRQN1A+.doc

Original File Name: Cap and Trade auction comments 2013.doc

Date and Time Comment Was Submitted: 2013-03-08 16:47:21

No Duplicates.

Comment 298 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Megan
Last Name: Kirkeby
Email Address: mkirkeby@chpc.net
Affiliation: CHPC

Subject: CHPC Comments
Comment:

```
Please see attached comments and please feel free to contact me if
you have any questions.

Thank you for this opportunity,
Megan Kirkeby
Sustainable Housing Policy Associate
California Housing Partnership Corporation
mkirkeby@chpc.net
415-433-6804x319
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Attachment: www.arb.ca.gov/lists/com-attach/331-2013investmentpln-ws-WjlWOFMiBTVQCQNg.pdf

Original File Name: CHPC_Cap&TradeCommentLtr_030813.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:49:13

No Duplicates.

Comment 299 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Romel
Last Name: Pascual
Email Address: romel.pascual@lacity.org
Affiliation: Deputy Mayor - City of Los Angeles

Subject: Comments - from City of Los Angeles
Comment:

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Please see attached
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Attachment: www.arb.ca.gov/lists/com-attach/332-2013investmentpln-ws-AmFQP1QhBy0EXQlm.pdf

Original File Name: city of los angeles comments cap and trade.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:47:42

No Duplicates.

Comment 300 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Raymond
Last Name: Baltar
Email Address: raymond.baltar@gmail.com
Affiliation:

Subject: Biochar Research and Development
Comment:

I am advocating for a portion of the investment plan proceeds to be dedicated to biochar research and development. Helping to develop this new industry by dedicating a small portion of Cap and Trade money represents a profound opportunity for the state of California to:

1.Divert thousands of tons of biomass to a higher and better use
2.Develop improved forest management practices
3.Jumpstart new businesses that can locally manufacture a valuable soil enhancer that has been shown to stimulate crop production, decrease nutrient losses, increase soil fertility, and decrease water use over time.
4.Stimulate private industry to produce large amounts of base-load renewable energy while also producing valuable co-products.
5.Help create both highly skilled and less skilled jobs in the Clean Tech Sector
6.Assist in the creation of a viable carbon credit revenue model for farmers by helping to develop standards for sequestering carbon through the use of biochar in their soils

A large number of peer-reviewed scientific studies have been conducted worldwide using biochar over the last 5 years, both in the lab and in the field, and there is a growing body of evidence that widespread use of biochar could help farmers build healthier soils and also adapt to climate change, while decreasing their nutrient and water requirements. This is certainly worth pursuing, in my view, both from an economic standpoint for farmers and as a hedge against the looming affects of climate change that are growing ever more severe.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 16:51:23

No Duplicates.

Comment 301 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Sean
Last Name: Lane
Email Address: slane@olympuspower.com
Affiliation:

Subject: PEB's Comments on CARB Cap-and-Trade Auction Proceeds Workshop
Comment:

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Please find attached PEB's comments to CARB's cap-and-trade auction
proceeds workshop.
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Attachment: www.arb.ca.gov/lists/com-attach/335-2013investmentpln-ws-UCBRMgZlWVUFYFU6.pdf

Original File Name: PEB Comments on CARB Cap-and-Trade Auction Proceeds Workshop (3.8.13).pdf

Date and Time Comment Was Submitted: 2013-03-08 16:47:10

No Duplicates.

Comment 302 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ann
Last Name: Rojas-Cheatham
Email Address: arojascheatham@gmail.com
Affiliation: Community Health for Asian Americans

Subject: Comments
Comment:

Comments for Cap-and-Trade Auction Proceeds Investment Plan

To: The California Air Resources Board
From: Nail Salon Women Greening Their Jobs and The Environment
A project of Community Health for Asian Americans in Oakland, California
Ann Rojas-Cheatham and Trang Nguyen (Co-Directors)

We are part of the SB 535 Coalition and fully support the coalition's principals and programs.

We would like to propose strategies for use of the California Cap-and-Trade Auction Proceeds that both improve the health of workers in low-wage toxic industries in California AND reduce GHG and other toxic pollutants from these industries.

Disadvantaged workers in California tend to work in mid-market industries (Ortiz, P. 2006, "Industries that are Tops for Women of Color" www.diversityinc.com Accessed January 3, 2010). These same mid-market industries have also been identified by the Hewlett Foundation as one of the top 5 sectors to be intervened upon in order to reduce greenhouse gas emissions (David and Lucile Packard Foundation, the Doris Duke Charitable Foundation, Energy Foundation, Joyce Foundation, California Environmental Associates, Oak Foundation, and the Wiliam and Flora Hewlett Foundation, (2007) 'Design to win, philanthropy's role in the fight against global warming, p.7, www.climateactionproject.com/docs/Design, accessed 2013. Efforts to mitigate climate change have focused on energy producing industries and the transportation sector. It is also critical to investigate secondary industries that depend on fossil fuel energy production. These industries that have indirect or 'secondary'greenhouse gas emissions, and collectively are as dirty as the top emitters are called mid-market companies. If mid-market industries don't alter their products and demands for energy, oil refineries and coal plants that are major sources of CO2 emissions will continue to produce the same supply.

Though mid-market industries do not directly emit significant amounts of GHGs, they have a greater than expected impact on global warming through GHG emissions released in the full life cycle (extraction to disposal) of the primary chemicals and materials used to make their products.

In many low-wage toxic mid level industries climate change mitigation opportunities can also improve the health and working

conditions of disadvantaged workers and their communities. These include the nail salon industry, the semiconductor industry, the dry-cleaning industry and the auto body industry among others.

We propose programs that will transform these industries to reduce their GHG emissions and other toxic pollutants AND improve the working conditions for the workers in the industries. We propose public/private partnerships in order to make these changes. A good example of a public/private partnership is the program in which the City of Los Angeles AND the trucking corporations both agreed to contribute resources to the change out of diesel engines to engines that would reduce greenhouse gases and have an improved impact on driver's health.

Currently Nail Salon Women Greening Their Jobs and the Environment is working to transform the nail salon industry in Oakland in order to both reduce the GHG and other toxic pollutants from the industry AND improve the health and working conditions of nail salon workers city wide. Nail salons in Oakland need support and resources to make changes to reduce their energy use, use less toxic products, reduce their water use and improve their disposal practices. A public/private partnership between corporations that supply products (nail products, energy, water and cleaning products) and the government could be developed to provide the necessary resources and technical assistance to California Nail Salons in order to transform this industry.

We propose that many mid level industries beyond nail salons in California could reduce their GHG and other toxic pollutants (improving air quality) and simultaneously improve the working conditions of disadvantaged workers (green jobs that workers are already in) statewide via public/private partnerships supported by Cap and Trade Auction Proceeds.

Attachment: www.arb.ca.gov/lists/com-attach/336-2013investmentpln-ws-WzxQMwZpU2QAYwFz.pdf

Original File Name: Gender & Climate Change chapter.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:52:17

No Duplicates.

Comment 303 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Steve
Last Name: Lautze
Email Address: slautze@oaklandnet.com
Affiliation: Calif. Assn. of RMDZs

Subject: Submittal of Comments re: Allocation of Cap and Trade Proceeds Years 1-3
Comment:

```
Hello Ms. Livingstone (I presume?): thank you for calling me back
earlier this week to clarify the scope of the overall call for
comments on the Cap and Trade Investment Plan, and the narrower
scope of the Governor's January budget priorities in this area.

Per your encouragement, I am submitting a ~10+ page document on
behalf of the California Association of Recycling Market
Development Zones, which also references a related organization
known as the Recycling BIN (Build Infrastructure Now) Coalition.

We will continue to monitor the process carefully and hope for the
best, both for CARMDZ and the great state of California.

Steve Lautze
CARMDZ President
```

Attachment: www.arb.ca.gov/lists/com-attach/337-2013investmentpln-ws-VzQFYgNwWGYCYFMp.doc

Original File Name: CARMDZ Cap and Trade Funding Submittal FINAL 3-8-13.doc

Date and Time Comment Was Submitted: 2013-03-08 16:54:41

No Duplicates.

Comment 304 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Nick
Last Name: Lapis
Email Address: nicklapis@cawrecycles.org
Affiliation: Californians Against Waste

Subject: Support for Increased Funding for Recycling, Composting and Recycled Content Manufacturing
Comment:

```
Attached please find comments from Californians Against Waste.
```

Attachment: www.arb.ca.gov/lists/com-attach/338-2013investmentpln-ws-B2QAZwN1WFQDNwMz.doc

Original File Name: CAW 2013 Investment Plan 03-08-13.doc

Date and Time Comment Was Submitted: 2013-03-08 16:58:01

No Duplicates.

Comment 305 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Elisa
Last Name: Noble
Email Address: elisa@placercountyrcd.org
Affiliation:

Subject: Cap and Trade Auction Comments
Comment:

```
Please find Placer Country RCD's comments attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/339-2013investmentpln-ws-W2hSeVFoVSsFMgQ3.pdf

Original File Name: 3-8-13 ARB AB32 Comments.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:57:51

No Duplicates.

Comment 306 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Romel
Last Name: Pascual
Email Address: romel.pascual@lacity.org
Affiliation: Deputy Mayor - City of Los Angeles

Subject: revised City of LA comments
Comment:

```
see attached
```

Attachment: www.arb.ca.gov/lists/com-attach/340-2013investmentpln-ws-UDNQPwRxBS8KU1M8.pdf

Original File Name: city of los angeles revised comments cap and trade.pdf

Date and Time Comment Was Submitted: 2013-03-08 16:59:15

No Duplicates.

Comment 307 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Andrew
Last Name: Burnette
Email Address: andrew.burnette@infowedge.com
Affiliation: infoWedge

Subject: Cleaner, more efficient and lower cost commuter rail
Comment:

Other commenters have reerred to a concept that I also support -- Commuter Rail that has lower emissions and higher efficiency. My comment is to direct you to that concept. See comment number 24, by Dave Cook, and its attachment. I hope you give it serious consideration since its time has come and state support is needed to bring its benefits to economic justice areas more quickly.

It's got something for everyone. I especially like that it would eliminate diesel particulate from commuter rail right-of-ways and would save the state millions in subsidies to commuter rail. I think you will also appreciate its large greenhouse gas benefits. Commuters will like its higher performance (faster accelerations and shorter times between stops).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-08 16:52:30

No Duplicates.

Comment 308 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Stuart
Last Name: Cohen
Email Address: Stuart@transformca.org
Affiliation: TransForm

Subject: Cap and Trade
Comment:

see attachment

Attachment: www.arb.ca.gov/lists/com-attach/342-2013investmentpln-ws-USVQMFAOUGADZAV3.docx

Original File Name: TF CARB comments_final.docx

Date and Time Comment Was Submitted: 2013-03-08 17:02:34

No Duplicates.

Comment 309 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Lindell
Last Name: Price
Email Address: LindellPrice@gmail.com
Affiliation:

Subject: Cap-and-Trade Proceeds
Comment:

Lindell Price
3672 Millbrae Road
Cameron Park, CA 95682

Email: LindellPrice@gmail.com

March 8, 2013

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

RE: Investment plan for cap-and-trade auction revenues

Dear Chair Nichols:

As an advocate for building healthy communities, I would like to express my strong support for using cap-and-trade revenues to efficiently provide transportation and housing choices that allow Californians to reduce household costs. By building communities in which housing, jobs, services, and recreation are reliably and conveniently accessible by foot, transit, and bicycle, we can reduce the cost of living while enhancing community health. Please invest cap-and-trade auction revenues in pedestrian and bicycle facilities on which people can rely for year-round, 24-hour transportation, and for efficient public transit.

Implement clear accountability, and performance based standards. Do not use cap-and-trade funds for recreational trails that fail to meet the needs of Californians for reliable year-round, 24-hour, all-weather transportation to and from work and other essential destinations. Do not allocate cap-and-trade funding to high-speed rail, but allocate instead to lower-cost, higher-benefit public transportation improvements, and energy-efficient community and building designs.

When people are priced out of homes near job centers and high-quality transit hubs, they must drive long distances to work. As a resident of El Dorado County, I am especially conscious of the need to provide housing and transportation options that are affordable to low and moderate income households, and am involved in local efforts toward this goal. Please provide a sound state framework for moving money to the local level.

Sincerely yours,

Lindell Price

cc: Ryan Wiggins, TransForm rwiggins@transformca.org

Attachment: www.arb.ca.gov/lists/com-attach/343-2013investmentpln-ws-AGNTNFUkAnxVMlA+.pdf

Original File Name: Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2013-03-08 17:01:33

No Duplicates.

Comment 310 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Patrick
Last Name: Wright
Email Address: pwright@tahoe.ca.gov
Affiliation: California Tahoe Conservancy

Subject: Conservancy input for natural resources included CT auction revenues
Comment:

```
Please see attached memo
```

Attachment: www.arb.ca.gov/lists/com-attach/344-2013investmentpln-ws-UDMHdVU3Ul4LbgJj.docx

Original File Name: CTC_CARB Investment CT Aution Cmts_final.docx

Date and Time Comment Was Submitted: 2013-03-08 16:43:42

No Duplicates.

Comment 311 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: kyra
Last Name: Ross
Email Address: mandkross@comcast.net
Affiliation: City of Sacramento

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attachment.

Attachment: www.arb.ca.gov/lists/com-attach/345-2013investmentpln-ws-AWJSPVwpACpQCQNs.pdf

Original File Name: City of Sacramento Comments.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:01:15

No Duplicates.

Comment 312 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kelly
Last Name: Stachowicz
Email Address: KStachowicz@cityofdavis.org
Affiliation: City of Davis

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/346-2013investmentpln-ws-AWBdKVQ3Ag4EbgBl.pdf

Original File Name: ARB Letter 3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:50:40

No Duplicates.

Comment 313 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Evan
Last Name: Edgar
Email Address: Evan@edgarinc.org
Affiliation:

Subject: Allocation of Cap and Trade Proceeds for the Diversion of Organic Waste to Bioenergy
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/347-2013investmentpln-ws-AmEFZQBvBTMEdlMM.pdf

Original File Name: CFNET AB118Ltr 3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:53:44

No Duplicates.

Comment 314 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Shawn
Last Name: Marshall
Email Address: shawnmarshall@leanenergyus.org
Affiliation:

Subject: Allocation of Cap and Trade
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/348-2013investmentpln-ws-UjEBYVI9WW9WJAZZ.pdf

Original File Name: CFNET AB118Ltr 3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 315 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Mari Rose
Last Name: Taruc
Email Address: marirose@apen4ej.org
Affiliation:

Subject: Investment Principles and Comments on Draft Concept Paper on Cap-and- Trade Auction
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/349-2013investmentpln-ws-WygHY1IMWD5WY1di.pdf

Original File Name: SB 535 Coalition Comments on Concept Paper and Workshops 03 08 13 v2.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 316 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Steve
Last Name: Sherr
Email Address: Steve.Sherr@foundationwindpower.com
Affiliation:

Subject: Cap and Trade Proceeds Allocation Proposal of FWP
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/350-2013investmentpln-ws-AWJdOgFwBwsDZAJs.pdf

Original File Name: Cap and Trade Proceeds Allocation Proposal of FWP.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 317 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ellen
Last Name: Biasin
Email Address: ellenbiasin@ymail.com]
Affiliation:

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/351-2013investmentpln-ws-WzgCa1I+BTsHZFU7.pdf

Original File Name: Comments to ARB re Investment Fund.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 318 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Paul
Last Name: Relis
Email Address: PaulR@crrmail.com
Affiliation:

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/352-2013investmentpln-ws-WzIHbAZgAH1QJghs.pdf

Original File Name: IMG.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 319 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Paul
Last Name: Relis
Email Address: PaulR@crrmail.com
Affiliation:

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/353-2013investmentpln-ws-AGkHbANlU19XYQY2.pdf

Original File Name: IMG_0001.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 320 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Richard
Last Name: Cameron
Email Address: ombcomm@arb.ca.gov
Affiliation:

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/354-2013investmentpln-ws-BjQHMVVlWTkDKAQ0.pdf

Original File Name: 2013-03-08 Richard Cameron Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 321 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ed
Last Name: Pike
Email Address: epike@energy-solution.com
Affiliation: Energy Solutions

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/356-2013investmentpln-ws-UTBRNVBiVDVRCAlq.pdf

Original File Name: AB32_comments_3-8-2013 r1.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 322 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Steve
Last Name: Pinkerton
Email Address: ombcomm@arb.ca.gov
Affiliation: City of Davis

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/357-2013investmentpln-ws-ATMGYVwvUGFRCARo.pdf

Original File Name: 2ARB Letter 3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 323 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Scott
Last Name: Geremia
Email Address: scottgeremia@gmail.com
Affiliation: neo forestry inc

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

As for investing the proceeds from the auction in projects that will create
reciprocal income for the state, please take a look at our suggestions.
We are an exclusive provider and grower of a hybrid tree (Paulowina Select).
The tree grows at very high rate of about 55 feet in three years, on poor none arable land, with very low amounts of water.
About 1 gallon of water per day is the needed rate for the first year, a orange tree uses about 25 gallons a day.
Our tree removes mass amounts of carbon, as you can see in the pdf attached.
We are able to create hundreds of jobs, as well as the amount of lumber, biomass feedstock, and or oil we can create is amazing.
Our tree is non invasive, can be watered with waste water.
Take a look over the numbers, and potential revenue for the state.

Stockton Port is a perfect example of where these trees are needed.

Not only is Neowood growing jobs, and cleaning our land, water and air, but breaks down the food vs fuel debate of sugar cane and corn.
The USDA BCAP credit may be reinstated and help drive more local green fuel producers.

Please visit our website at Neoforestry.com for more information.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 324 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Julia
Last Name: Levin
Email Address: scottgeremia@gmail.com
Affiliation: Bioenergy Association of California

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/359-2013investmentpln-ws-UTNUM1U3VloAZQVq.docx

Original File Name: BAC Comments on Cap and Trade Proceeds.docx

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 325 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Neil
Last Name: Black
Email Address: nblack@calbioenergy.com
Affiliation: California Bioenergy LLC

Subject: Allocation of Cap and Trade Proceeds for the Diversion of Organic Waste to Bioenergy
Comment:

```
see attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/361-2013investmentpln-ws-AmFUM1c6ADpWNgZp.pdf

Original File Name: California Bioenergy LLC AB 32 Letter 3-8-13.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 326 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Fernando
Last Name: Gaytan
Email Address: FGaytan@lafla.org
Affiliation: Legal Aid Foundation of Los Angeles

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/362-2013investmentpln-ws-UiIGZFA3U18AZQBv.pdf

Original File Name: PDF copy Ltr Comments to Air Resources Board.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 327 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Katie
Last Name: Haldeman
Email Address: k.london.haldeman@gmail.com
Affiliation: Ventura County Resource Conservation Dis

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/363-2013investmentpln-ws-AmFTNFA9ADAGYQNt.pdf

Original File Name: CalCan Letter VCRCD.pdf

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 328 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Torri
Last Name: Estrada
Email Address: c6institute@gmail.com
Affiliation: Carbon Cycle Institute

Subject: Cap and Trade and agriculture
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/364-2013investmentpln-ws-B2RVPFA8VmhXNARq.doc

Original File Name: Comment Letter for Cap and Trade Investment Plan 3-8-13.doc

Date and Time Comment Was Submitted: 2013-03-15 10:55:51

No Duplicates.

Comment 329 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: David
Last Name: Fisher
Email Address: dfisher@fisherire.com
Affiliation: Fisher Solar USA

Subject: Re: Mechanics of the Application and Fuding Process for CCAT Auction Proceeds Inves
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/365-2013investmentpln-ws-BWFcPFE5AyMLZQht.zip

Original File Name: DFisherComments.zip

Date and Time Comment Was Submitted: 2013-03-15 11:47:02

No Duplicates.

Comment 330 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: California Compost C
Last Name: N/A
Email Address: ombcomm@arb.ca.gov
Affiliation: California Compost Coalition

Subject: White Paper Investment of Cap and Trade Auction Proceeds Diversion of Organic Waste
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/366-2013investmentpln-ws-VDddOlQKVWUBaAZr.pdf

Original File Name: CA Compost Coalition.pdf

Date and Time Comment Was Submitted: 2013-03-15 14:02:06

No Duplicates.

Comment 331 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Bruce
Last Name: McPherson
Email Address: ombcomm@arb.ca.gov
Affiliation: County of Santa Cruz Board of Supervisor

Subject: RE:Resolution Expressing Support for Distribution of Carbon Cap-and-Trade Auction..
Comment:

See attachments

Attachment: www.arb.ca.gov/lists/com-attach/367-2013investmentpln-ws-VzQGb1woBzoKeAV8.zip

Original File Name: CountyofSantaCruz.zip

Date and Time Comment Was Submitted: 2013-03-15 14:08:32

No Duplicates.

Comment 332 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jim
Last Name: Lites
Email Address: jlites@schottlites.com
Affiliation: California Airports Council

Subject: RE: Cap-and-Trade Auction Proceed Investment Plan – Comments from the California
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/370-2013investmentpln-ws-UjFXMFAhVlpRNlI8.docx

Original File Name: Cap and Trade Comment letter.docx

Date and Time Comment Was Submitted: 2013-03-15 15:32:52

No Duplicates.

Comment 333 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: James
Last Name: Silverwood
Email Address: ombcomm@arb.ca.gov
Affiliation: Affirmed Housing Group

Subject: RE: Investment plan for cap and trade auction revenues
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/371-2013investmentpln-ws-VDVTM1A3VmxVIQJv.pdf

Original File Name: Affirmed Housing group.pdf

Date and Time Comment Was Submitted: 2013-03-15 15:36:11

No Duplicates.

Comment 334 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jack
Last Name: Broadbent
Email Address: bbateman@baaqmd.org
Affiliation: BAAQMD

Subject: RE:Development of an Investment Plan for the Auction Proceeds from the Cap-and-Trad
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/372-2013investmentpln-ws-VjRdOlIqVloDZFQm.pdf

Original File Name: Bay Area AQMD.pdf

Date and Time Comment Was Submitted: 2013-03-15 15:38:09

No Duplicates.

Comment 335 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Sean
Last Name: Edgar
Email Address: ombcomm@arb.ca.gov
Affiliation: Clean Fleets .Net

Subject: RE:Allocation of Cap and Trade Proceeds for the Diversion of Organic Waste to Bioene
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/373-2013investmentpln-ws-VDdRO1I2BTdWPlM1.pdf

Original File Name: CleanFleets.pdf

Date and Time Comment Was Submitted: 2013-03-15 15:46:39

No Duplicates.

Comment 336 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Robert
Last Name: Doyle
Email Address: ombcomm@arb.ca.gov
Affiliation: East Bay Regional Park District

Subject: RE: Investment of AB 32 Auction Proceeds in Natural Resources and Working Lands to r
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/374-2013investmentpln-ws-UDVUM1wuACcLUlQ2.pdf

Original File Name: East Bay Regional Park Dist.pdf

Date and Time Comment Was Submitted: 2013-03-15 15:52:09

No Duplicates.

Comment 337 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Greg
Last Name: Pasquali
Email Address: gregory.pasquali@aya.yale.edu
Affiliation: Holliday Development

Subject: RE:Investment plan for cap-and-trade auction revenues
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/375-2013investmentpln-ws-UjVSJl05BDABWFAg.pdf

Original File Name: Greg Pasquali.pdf

Date and Time Comment Was Submitted: 2013-03-15 15:55:05

No Duplicates.

Comment 338 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Michael
Last Name: Pucci
Email Address: ombcomm@arb.ca.gov
Affiliation: Housing Authority of the City of Alameda

Subject: RE: Investment Plan for Cap and Trade Auction Revenues
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/376-2013investmentpln-ws-UjpVPF0pUnIAb1U7.pdf

Original File Name: Housing Authority City of Alameda.pdf

Date and Time Comment Was Submitted: 2013-03-15 15:59:51

No Duplicates.

Comment 339 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Maureen
Last Name: Stapleton
Email Address: ombcomm@arb.ca.gov
Affiliation: San Diego County Water Authority

Subject: RE:Investment Plan for Cap and Trade Auction Revenues
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/377-2013investmentpln-ws-WilSNQFuAAwBY1M6.pdf

Original File Name: San Diego County water authority.pdf

Date and Time Comment Was Submitted: 2013-03-15 16:02:32

No Duplicates.

Comment 340 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kara
Last Name: Heckert
Email Address: ombcomm@arb.ca.gov
Affiliation: Sotoyome and Southern Sonoma RCD

Subject: Comment from Sotoyome and Southern Sonoma RCD
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/378-2013investmentpln-ws-B3QAaQZyU3QHaVUw.pdf

Original File Name: Southern Sonoma RCD.pdf

Date and Time Comment Was Submitted: 2013-03-15 16:05:18

No Duplicates.

Comment 341 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Tim
Last Name: Schott
Email Address: tschott@schottlites.com
Affiliation: California Association of Port Authoriti

Subject: RE: Investment Plan for Auction Proceeds from Cap and Trade Program
Comment:

```
See attachment.
```

Attachment: www.arb.ca.gov/lists/com-attach/379-2013investmentpln-ws-AmEBZlEgAzEDWgNg.pdf

Original File Name: CAPA Cap-and-Trade ltr.pdf

Date and Time Comment Was Submitted: 2013-03-15 16:18:45

No Duplicates.

Comment 342 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: John
Last Name: Gamper
Email Address: jgamper@cfbf.com
Affiliation: California Farm Bureau Federation

Subject: Comments from California Farm Bureau Federation
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/380-2013investmentpln-ws-VTZRNlMgVGVRCFQn.pdf

Original File Name: CARB Submittal.pdf

Date and Time Comment Was Submitted: 2013-03-15 16:23:49

No Duplicates.

Comment 343 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Steve
Last Name: Sherr
Email Address: Steve.Sherr@foundationwindpower.com
Affiliation: Foundation Windpower

Subject: RE:Allocation of Cap and Trade Proceeds to Support On-Site Deployment of 100% Renewa
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/381-2013investmentpln-ws-WjkCZQBxWVUGYQhm.pdf

Original File Name: Cap and Trade Proceeds Allocation Proposal of FWP.pdf

Date and Time Comment Was Submitted: 2013-03-15 16:27:38

No Duplicates.

Comment 344 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Fernando
Last Name: Gaytan
Email Address: FGaytan@lafla.org
Affiliation: Legal Aid Foundation of Los Angeles

Subject: RE: Comments on Draft Concept Paper for cap and trade auction revenue Investment Pla
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/382-2013investmentpln-ws-VCRSMFUyWFRQNVM8.pdf

Original File Name: PDF copy Ltr.Comments to Air Resources Board.PDF

Date and Time Comment Was Submitted: 2013-03-15 16:40:12

No Duplicates.

Comment 345 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Leonard
Last Name: Robinson
Email Address: envirobro@hotmail.com
Affiliation: CALIFORNA BLACK CHAMBER OF COMMERCE

Subject: Investment Strategies Comments
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/383-2013investmentpln-ws-UTgAaFQjWW8AdQl9.docx

Original File Name: Investment Strategies Comments.docx

Date and Time Comment Was Submitted: 2013-03-15 16:46:57

No Duplicates.

Comment 346 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Matt
Last Name: Schrap
Email Address: mschrap@cafleetsolutions.com
Affiliation: Crossroads Equipment Finance

Subject: RE: Cap & Trade Auction Revenue for a Loan Assistance Program
Comment:

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See attachment.
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Attachment: www.arb.ca.gov/lists/com-attach/384-2013investmentpln-ws-BmVXMANyUl4DWgdY.pdf

Original File Name: Cap & Trade - Loan Program.pdf

Date and Time Comment Was Submitted: 2013-03-18 09:26:02

No Duplicates.

Comment 347 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jamie
Last Name: Hall
Email Address: jhall@calstart.org
Affiliation: CALSTART

Subject: RE: Cap-and-Trade Auction Proceeds Investment Plan
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/387-2013investmentpln-ws-AmFcOwdqWHhRIwVk.pdf

Original File Name: CALSTART comments on AB 32 proceeds investment plan.pdf

Date and Time Comment Was Submitted: 2013-03-18 11:09:11

No Duplicates.

Comment 348 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Ken
Last Name: Pimlott
Email Address: ombcomm@arb.ca.gov
Affiliation: CA Dept. of Forestry and Fire Protection

Subject: Letter of Comment from CAL FIRE
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/388-2013investmentpln-ws-UDNcO1Q5WVUCYlU8.pdf

Original File Name: CAL FIRE Comments on Investment Plan 3-8-2013.pdf

Date and Time Comment Was Submitted: 2013-03-18 11:14:17

No Duplicates.

Comment 349 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Rebecca
Last Name: Turner
Email Address: rturner@americanforests.org
Affiliation: American Forests

Subject: Supporting Urban Forestry in CA Cap and Trade Revenue Allocations
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/389-2013investmentpln-ws-UjEAZwBtV3ZRMgZq.docx

Original File Name: CalReLeaf CAR letter.docx

Date and Time Comment Was Submitted: 2013-03-18 11:19:49

No Duplicates.

Comment 350 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Joshua
Last Name: Stark
Email Address: jstark@transformca.org
Affiliation: TransForm

Subject: Sustainable Communities for All, Cap and Trade Funding for Transportation and Housi
Comment:

See attachments.

Attachment: www.arb.ca.gov/lists/com-attach/391-2013investmentpln-ws-B3RXJFAiVXIEYwJr.zip

Original File Name: Sustainable Communities for All.zip

Date and Time Comment Was Submitted: 2013-03-19 11:14:34

No Duplicates.

Comment 351 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Frank
Last Name: Caponi
Email Address: FCaponi@lacsd.org
Affiliation: Los Angeles County Sanitation Districts

Subject: Local Governments Proposal for CARB Auction Revenue Investment Plan
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/com-attach/392-2013investmentpln-ws-VzFSJgRkV2oBbFIx.pdf

Original File Name: FrankC.pdf

Date and Time Comment Was Submitted: 2013-03-19 11:41:47

No Duplicates.

Comment 352 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Megan
Last Name: Kirkeby
Email Address: mkirkeby@chpc.net
Affiliation: California Housing Partnership

Subject: RE: Investment plan for cap-and-trade auction revenues
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/393-2013investmentpln-ws-AWJXJQdlU29WPQRp.docx

Original File Name: CTComment Letter Mutual Housing.docx

Date and Time Comment Was Submitted: 2013-03-19 13:38:29

No Duplicates.

Comment 353 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Betsy
Last Name: McGovern-Garcia
Email Address: ombcomm@arb.ca.gov
Affiliation: City of Visalia

Subject: City of Visalia Comments on the Development of the Cap-and-Trade Auction Proceeds
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/394-2013investmentpln-ws-WzgFagN2WHIGX1c4.pdf

Original File Name: city of visalia_fresno.pdf

Date and Time Comment Was Submitted: 2013-03-19 13:41:53

No Duplicates.

Comment 354 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Robert
Last Name: Dhondrup
Email Address: rdhondrup@scanph.org
Affiliation: SCANPH

Subject: Comments from SCANPH
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/395-2013investmentpln-ws-ViUBZAZmWGUGcAdv.pdf

Original File Name: SCANPH.pdf

Date and Time Comment Was Submitted: 2013-03-19 13:45:52

No Duplicates.

Comment 355 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Cynthia
Last Name: Vitale
Email Address: cynthia@csgcalifornia.com
Affiliation: Conservation Strategy Group

Subject: Letter to ARB
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/396-2013investmentpln-ws-AjEAWVRtAg4CNQU2.pdf

Original File Name: 3 8 13 Letter to ARB- Conservation.pdf

Date and Time Comment Was Submitted: 2013-03-20 08:03:04

No Duplicates.

Comment 356 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Kenneth
Last Name: Koyama
Email Address: kenk@capcoa.org
Affiliation: CAPCOA

Subject: Recommendations for the Investment Plan for Cap and Trade Auction Proceeds
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/397-2013investmentpln-ws-B2RSNQd2VGRROAdm.pdf

Original File Name: CAPCOA Cap and Trade Investments (Mary Nichols).pdf

Date and Time Comment Was Submitted: 2013-03-20 08:08:42

No Duplicates.

Comment 357 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Pat
Last Name: Kidder
Email Address: kidder@surewest.net
Affiliation: California Fire Safe Council

Subject: ARB Comments
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/398-2013investmentpln-ws-AGxRMgN2UnUCYVQm.pdf

Original File Name: letter to Ms Nichols Chair Air R Bd Mar 2013.pdf

Date and Time Comment Was Submitted: 2013-03-20 08:08:42

No Duplicates.

Comment 358 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Barry
Last Name: Wallerstein
Email Address: ombcomm@arb.ca.gov
Affiliation: SCAQMD

Subject: RE: Recommendations for Investment Plan for Cap-and-Trade Auction Proceeds
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/399-2013investmentpln-ws-B3QAZQdnUnADaAdj.pdf

Original File Name: SCAQMD.pdf

Date and Time Comment Was Submitted: 2013-03-20 08:17:52

No Duplicates.

Comment 359 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Rachel
Last Name: Iskow
Email Address: rachel@mutualhousing.com
Affiliation: Mutual Housing California

Subject: Investment plan for cap-and-trade auction revenues
Comment:

See attached

Attachment: www.arb.ca.gov/lists/com-attach/402-2013investmentpln-ws-VzQGdAFjUGwDaAdq.doc

Original File Name: CTComment Letter Mutual Housing.doc

Date and Time Comment Was Submitted: 2013-03-20 09:42:53

No Duplicates.

Comment 360 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Bill
Last Name: Martin
Email Address: ombcomm@arb.ca.gov
Affiliation: Central Valley Farmland Trust

Subject: Comments to ARB
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/403-2013investmentpln-ws-AmFXNFQ7VnECdlIz.pdf

Original File Name: Central Valley Farmland Trust.pdf

Date and Time Comment Was Submitted: 2013-03-20 14:20:54

No Duplicates.

Comment 361 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Dennis
Last Name: Frank
Email Address: ombcomm@arb.ca.gov
Affiliation: Soutwest California Legislative Coucil

Subject: Comments on the 2013 Investment Plan
Comment:

see attachment

Attachment: www.arb.ca.gov/lists/com-attach/404-2013investmentpln-ws-VCcHdlQKVWUCZQNv.pdf

Original File Name: SW California Legislative Coucil.pdf

Date and Time Comment Was Submitted: 2013-03-20 14:23:46

No Duplicates.

Comment 362 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: J. Stacey
Last Name: Sullivan
Email Address: suscon@suscon.org
Affiliation: Sustainable Conservation

Subject: Comments on the 2013 Investment Plan
Comment:

See attachment

Attachment: www.arb.ca.gov/lists/com-attach/405-2013investmentpln-ws-WilUJ1EjVXIGYQBp.pdf

Original File Name: Sustainable Conservation.pdf

Date and Time Comment Was Submitted: 2013-03-20 14:25:42

No Duplicates.

Comment 363 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jeffrey
Last Name: Knightlinger
Email Address: ombcomm@arb.ca.gov
Affiliation: The Metropolitian Water District of SC

Subject: Written comments for the Investment Plan
Comment:

See attachment

Attachment: www.arb.ca.gov/lists/com-attach/406-2013investmentpln-ws-UiZdMwdjBQlQO1cy.pdf

Original File Name: The Metropolitan Water District of SoCal.pdf

Date and Time Comment Was Submitted: 2013-03-20 14:31:13

No Duplicates.

Comment 364 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Jim
Last Name: Richardson
Email Address: ombcomm@arb.ca.gov
Affiliation: Santa Barbara County APCD

Subject: Cap and Trade Auction Funds
Comment:

see attached

Attachment: www.arb.ca.gov/lists/com-attach/407-2013investmentpln-ws-WilRNQRmUGJQJgFi.pdf

Original File Name: sbcapcd-board-03-21-13-VSR-support (2).pdf

Date and Time Comment Was Submitted: 2013-04-02 13:22:36

No Duplicates.

Comment 365 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Salud
Last Name: Carbajal
Email Address: ombcomm@arb.ca.gov
Affiliation: County of Santa Barbara

Subject: Cap and Trade Auction funds
Comment:

See attached

Attachment: www.arb.ca.gov/lists/com-attach/408-2013investmentpln-ws-AHMHY1B8BzdSOwRx.pdf

Original File Name: SB-County-Marine Vessel Speed Reduction Support Letter (2).pdf

Date and Time Comment Was Submitted: 2013-04-02 13:26:27

No Duplicates.

Comment 366 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Helene
Last Name: Schneider
Email Address: ombcomm@arb.ca.gov
Affiliation: City of Santa Barbara

Subject: Cap and Trade Auction Funds
Comment:

see attached

Attachment: www.arb.ca.gov/lists/com-attach/409-2013investmentpln-ws-VzpUM1EiU3lXDgFv.pdf

Original File Name: Mary Nichols CA Air Resource Board pdf.pdf

Date and Time Comment Was Submitted: 2013-04-02 13:30:18

No Duplicates.

Comment 367 for 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) - 1st Workshop.

First Name: Claire
Last Name: Schlotterbeck
Email Address: ombcomm@arb.ca.gov
Affiliation: Hills for Everyone

Subject: Cap and Trade Auction Proceeds
Comment:

see attached

Attachment: www.arb.ca.gov/lists/com-attach/410-2013investmentpln-ws-AmpVOgZrUm1SJ1QL.pdf

Original File Name: hills for everyone.pdf

Date and Time Comment Was Submitted: 2013-04-02 13:33:08

No Duplicates.

There are no comments posted to 2013 Investment Plan for Cap-and-Trade Auction Proceeds (2013investmentpln-ws) that were presented during the Workshop at this time.