Comment 1 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: HELEN
Last Name: CARMEAN
Email Address: HMCarmean@excite.com
Affiliation: retired

Subject: ab 32 program design
Comment:

The legislators passed ab 32 to reduce greenhouse gases by 20% in ten years. California Air Resources Board is authorizing and buildingnew fossil fuel power natural gas plants that add 3% nore CO2 in the atmosphere each year, at least another 3 million tons of CO2 each year. This is more CO2 than can be reduced by all the AB 32restrictive regulations on the working people in California.

The anti-nuclear policies of California politians guarantee that California will add 20% more CO2 to the atmosphere over the next ten years, not reduce by 20%--and you at CARB KNOW THIS, WHILE YOU LIE TO THE PUBLIC, ALONG WITH THE POLITICIANS, INCLUDING THE GOVERNOR.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-30 15:00:57

No Duplicates.

Comment 2 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Ed
Last Name: Myers
Email Address: ecm@lescure-engineers.com
Affiliation: Lescure Engineers

Subject: Innovative consumer incentives for energy efficiency
Comment:

In the draft scoping plan, you note under Personal Actions, "Some households may choose to swap out incandescent light bulbs for more efficient compact fluorescent lights." Compact fluorescents have been available for 20 years, are cost effective on a life cycle (energy plus up front cost)basis for the consumer, yet after all this time they still are a "specialty" item in most stores I have visited. We should all be using them, I'm sure the statewide energy savings would be as substantial as many of the other measures outlined. Yet I presume the low up front cost plus familiarity keeps people buying incandescents for the most part.

Could we somehow incorporate the life cycle costs (including energy supply cost and carbon tax) into all light bulbs, and if the consumer wants to then pay more for an incandescent, fine. The revenue generated from taxing the incandescent could be used for other GHG reduction programs to offset the extra GHG's needed to run the inefficient incandescent.

This is just an example - surely as we move forward there are other ways to incentivize the public to adopt energy efficient technologies faster than they will just to "do the right thing". Especially when the right thing costs more up front, and in the energy savings for the individual are difficult to see in their utility bills, which fluctuate. However, I think the savings for the state as a whole would be considerable, and we could quantify them in the aggregate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 10:50:30

No Duplicates.

Comment 3 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Margaret
Last Name: Adrian
Email Address: Gramamag@aol.com
Affiliation:

Subject: AB32
Comment:

I congratulate CARB for recommending implementation of mandated energy standards, muscular energy efficiency measures, and clean vehicle requirements.

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

- Reduce vehicle miles traveled
- Speed up production of zero-emission vehicles
- Boost recycling rates
- Auction off any emissions permits
- Limit offsets
- Minimize air quality impacts in our most-polluted communities.

Thank you very much for all your hard work.

[Your name and address]

Suggested additional issues to choose from as recommendations to CARB:

- Transportation produces about 40% of greenhouse gas emissions in California. CARB should work for electrification of commercial, public and private transportation.
- I want to end my own production of GHGs. Help me by creating a Battery Electric Vehicle Partnership.
- Please mandate more land use planning that will reduce the need to drive, so that increasing vehicle use doesn’t erode the gains from fuel efficiency and low-carbon fuels.
- Please call for fast-tracking regional mass transit infrastructure, including Bus Rapid Transit programs (especially on existing freeway HOV lanes), expansion of Amtrak service, high-speed passenger rail, electrified commercial transport, and wise locations for transit station locations in neighborhoods.
- Recognize and encourage Community Choice Aggregation (CCA), which allows local governments to combine buying power of all customers in their jurisdiction for purchasing electricity.
- We need “Lifecycle tracking” of manufactured products, prioritizing reusables and locally-manufactured items.
- Utilize the powerful carbon reduction potential of zero waste---- reducing waste by design in manufacturing process, then reusing, recycling or composting products.

· Offsets from sinks, such as planting trees or avoiding tree cut-downs, should not be allowed, since they are too difficult to measure and often under-perform.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 15:38:26

1 Duplicates.

Comment 4 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Daniel
Last Name: Reeves
Email Address: horspucky@yahoo.com
Affiliation:

Subject: AB32 and AGWDaniel
Comment:

This subject has been such a colossal display of hubris and ignorance I can hardly begin. To draft, pass,and have the bill signed into law shows the hubris of mankind as manifest in our elected officials. To believe that we, mankind, can affect what we do not understand is to display our ignorance. We can mint as many PhD graduates as we want, all "specializing" in climate change, it still will not alter the laws of nature. We can shout it from the roof tops, and congratulate ourselves in black-tie at the awards dinner, it still does not make the science true.

Anthropological global warming (AGW) is a lie, no matter how many NASA scientists(?) testify in front of congress. Knowing a few myself, I have yet to find one to support Dr. Hansen and his conclusions(?) The science is not there. All the predictive models used by the IPCC are bunk. If the science was as decided as Mr Gore says it is, the models would have shown it, after all they are accurate, right? The science is far from decided and will remain so. Our planet is a complex system of complex systems; far too complex for us to "know" enough to act as we are.

CO2 is not causing us, or the planet, any harm. To regulate it is to regulate every breath exhaled by every person on the planet: is that even possible?

CO2 is not "pollution". This simple compound is traded freely in or ecosystem, it is part of our natural world. It is formed, disassociated, and reformed again and again in our ecosystem. You may have to look it up in a college text, the text used in my local high school has been changed to include this false doctrine, purging any real discussion of our physical world in our high schools.

The plan, as drafted and missing appendixes, will have a negative affect on our already weak economy in CA. This slate of regulations will drive business costs up, driving business out. Your prediction of new "green" jobs are a fantasy. Look to the past, the economy tanked because the middle class manufacturing jobs left when the aircraft and other manufacturing plants shut down. The companies that could, left the state. The ones left have seen the cost of business increase by as much as 45% or more. When bidding globally, it is a bad idea to have the highest costs. The cost of doing business in CA is always higher that other localities. The reason some manufacturing companies still exist is because of unique skills, or government red tape to move the

process. Poll anyone running a manufacturing business in CA and ask if they have to take smaller, or no, profit to remain competitive globally. With no profit, who can stay in business: government is the only "business" not charged with making a profit.

Is it possible the CARB could show some real leadership and NOT implement the regulatory statue until it can be PROVEN that there is a real threat?
I think the CARB would benefit by searching for and listing to the people who:
1. have a formal education in science / engineering.
2. DO NOT work for the government
3. Have looked at the available research from all sides.

I have much respect for those who accept the mantle of leader, but the politicians who made these decisions have insufficient scientific knowledge to do so. In short, they think they know more that they really do.

A general comment:
There is not enough time (60 minutes) alloted to comment sufficiently. There are specific actions cited in the draft that will cripple our industry. I will post them in the appropriate sub sectors.Reeves

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 16:52:54

No Duplicates.

Comment 5 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: George
Last Name: Dobosh
Email Address: gdobosh@yahoo.com
Affiliation:

Subject: Please hold polluters accountable!
Comment:

We still need strong, specific measures that hold polluters accountable. CARB must use its power to speed the production of zero-emission vehicles, shape smarter land use policies and boost recycling rates. Pumped-up public transit and strong zero-waste policies also will help us aggressively address the pollution that causes global warming.

Even though CARB's plan allows carbon trading to generate 20% of the greenhouse gas pollution reductions, it doesn’t specifically call for auctioning of emissions permits. Nor does it fully address the need to limit offsets and analyze the impacts of a cap-and-trade system on air quality in our most polluted communities. These steps would keep polluters accountable and protect our air. Please take these steps and protect our air!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 10:27:53

No Duplicates.

Comment 6 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Pauline
Last Name: Faye
Email Address: tp2hike@aol.com
Affiliation:

Subject: Global Warming
Comment:

I congratulate CARB for recommending implementation of mandated energy standards, muscular energy efficiency measures, and clean vehicle requirements.

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

- Reduce vehicle miles traveled
- Speed up production of zero-emission vehicles
- Boost recycling rates
- Auction off any emissions permits
- Limit offsets
- Minimize air quality impacts in our most-polluted communities.

Thank you very much for all your hard work.

Pauline Hollinger Faye
San Clemente, Ca. 92673

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 17:14:25

No Duplicates.

Comment 7 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Judy
Last Name: Rachel
Email Address: judyrachel@earthlink.net
Affiliation:

Subject: Final Scoping Plan
Comment:

I am all for CARB's recommending implementation of mandated energy standards, energy efficiency measures, and clean vehicle requirements.

But I feel more must be done if we are going to attain the major changes needed to prevent catastrophic changes to our climate. That is why I suggest including in your Final Scoping Plan steps to

Â· Reduce vehicle miles traveled

Â· Speed up production of zero-emission vehicles

Â· Boost recycling rates

Â· Auction off any emissions permits

Â· Limit offsets

Â· Minimize air quality impacts in our most-polluted communities.

Â· I want to end my own production of GHGs. Help me by creating a Battery Electric Vehicle Partnership.

Â· Please call for fast-tracking regional mass transit infrastructure, including Bus Rapid Transit programs (especially on existing freeway HOV lanes), expansion of Amtrak service, high-speed passenger rail, electrified commercial transport, and wise locations for transit station locations in neighborhoods.

Â· Utilize the powerful carbon reduction potential of zero waste---- reducing waste by design in manufacturing process, then reusing, recycling or composting products.

Â· Offsets from sinks, such as planting trees or avoiding tree cut-downs, should not be allowed, since they are too difficult to measure and often under-perform.

Thank you very much for all your hard work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 22:13:08

No Duplicates.

Comment 8 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Sal
Last Name: Jimenez
Email Address: slvdrjimenez@aol.com
Affiliation:

Subject: AB 32
Comment:

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Dear CARB,

I am writing to you on behalf of myself and my family. Please do
not give pollution credits away for free to industries, especially
heavy polluters. We should charge these industries and use the
money to develop clean air solutions.

Please help the planet and protect our environmental laws from
special interests.

Thank you for your time.

Sal Jimenez
Los Angeles, CA
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-06 14:14:25

No Duplicates.

Comment 9 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Jason
Last Name: Barbose
Email Address: jason@environmentcalifornia.org
Affiliation: Environment California

Subject: Petition in support of auctioning allowances
Comment:

July 14, 2008

The Honorable Arnold Schwarzenegger
Governor of California
State Capitol Building
Sacramento, Calif. 95815

Mary Nichols, Chairman
California Air Resources Board
1001 'I' Street
Sacramento, Calif. 95814

Dear Governor Schwarzenegger & Chairman Nichols:

On behalf of Environment California, I would like to congratulate the California Air Resources Board (ARB) for successfully developing the AB 32 draft Scoping Plan, the nation's first comprehensive roadmap for reducing global warming pollution to levels that science requires.

I am writing to present a letter from Environment California supporters. An area of particular concern to Environment California and many of our supporters is the design of the proposed cap and trade program. The success of a potential cap and trade program depends critically on the details of how it is designed and implemented. One of the most important design considerations is the method for distributing permits – or "allowances" – to emit greenhouse gas pollution. Environment California firmly believes that the state should auction 100 percent of the allowances in any cap and trade program.

As a citizen-based environmental advocacy organization, Environment California has an extensive network of supporters and members throughout the state who care deeply about California's landmark effort to tackle global warming. Through our outreach, more than 9,000 individuals have signed the following letter:

> To: Governor Schwarzenegger
> Cc: California Air Resources Board
>
> Thank you for your continued leadership in tackling global warming. The next step for California is to adopt strong policies to deter global warming pollution and invest in long-term solutions that will kick our dependence on fossil

fuels.

Please don’t give the state’s biggest polluters their pollution

“credits” for free. Instead, make polluters pay for every ton

of pollution they emit, and then funnel that money to wind and solar power, greener buildings and a cleaner transportation system.

Thank you.

Attached, for the ARB’s records and for review by the governor’s office, is a full list of all 9,246 individuals who signed the letter.

Thank you both for your leadership on this critical issue. By auctioning allowances, your administration will shift investments from dirty resources to clean technologies and further California’s place as a pioneer in producing real solutions to the climate crisis.

Sincerely,

Jason Barbose, Global Warming Advocate
Environment California

Attachment: www.arb.ca.gov/lists/sp-design-ws/10-environment_california_global_warming_petition.pdf

Original File Name: Environment California global warming petition.pdf

Date and Time Comment Was Submitted: 2008-07-14 15:33:31

No Duplicates.

Comment 10 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: John
Last Name: Stephens
Email Address: johnithin@aol.com
Affiliation:

Subject: Agricultural Pesticide Spraying
Comment:

```
Only 30% of a sprayed liquid actually lands on the intended
surface. A curtain assembly or other such containment system
should shroud agricultural sprayer heads to contain herbicides,
pesticides, and fungicides farmers use from areosoling into the
air. At present there is no such regulation or containment
equipment are required.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-14 22:04:40

No Duplicates.

Comment 11 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

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

Subject: Auction 100%, Study Regressivity, Compensate Consumers
Comment:

On behalf of the Climate Protection Campaign, we ask the ARB to consider the following recommendations for the market measures section of the Final Scoping Plan:
- Auction 100% of permits, with no phase-in. Let's not subsidize coal and prolong the transition to cleaner energy.
- Use all auction revenues to provide a Dividend to compensate consumers. With gasoline at $4.50/gallon and rising electricity prices, helping consumers deal with fuel and electricity costs is the best use of auction revenues. Other worthy projects should be funded with carbon fees.

We support CARB's intention to conduct a study on regressivity, encourage the Cap and Dividend concept as a potential solution, and also support ARB's proposal for a set of carbon fees to help pay for implementation of AB32 and other public goods such as clean technologies, green jobs, energy efficiency programs, and more.

Please see the attached detailed comments. Thank you for your consideration.

Sincerely,

Mike Sandler
Climate Protection Campaign

Attachment: www.arb.ca.gov/lists/sp-design-ws/12-cpcab32scopingplancomments7-8-08.pdf

Original File Name: CPCAB32ScopingPlanComments7-8-08.pdf

Date and Time Comment Was Submitted: 2008-07-15 15:17:42

No Duplicates.

Comment 12 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Philip
Last Name: Erro
Email Address: philiperro@sbcglobal.net
Affiliation: Westside Resource Conservation District

Subject: Use of Carbon Fees and Mandated REC payments
Comment:

1) First, in section 16. Agriculture of the Preliminary Rcommendation, the discussion is primarily about dairy manure emissions and digestion. There is a brief mention of N20 emissions from fertilizers; ammonia and other pollutants are also emitted from commerical fertilizers. All these emissions can be reduced by building up carbon in the soil, because high carbon soils retain nutrients effectively and thereby diminish the need for artificial fertilizers. Similarly, high carbon soils nourish crops and decrease their vulnerability to pests, reducing the need for pesticides. Since WWII we farmers have increasingly relied on artifical fertilizers and pesticides to get each crop to maturity. But building soil carbon could reduce that reliance and the attendant fertilizer and pesticide emissions such as VOCs. Besides building soil carbon, Integrated Pest Management uses biological as well as chemical means to control pests; and modern sprayers use optical sensors to turn the spray on and off and only spray where the target plants are located. These and other means minimize the use of pesticides on well managed farms. Both the California Department of Food and Agriculture and USDA Natural Resource Conservation Service can provide the ARB information on best practices to minimize air pollution. The ARB should consider awarding carbon fee revenues to farmers sho use these practices.
 The Agriculture section of the Preliminary Recommendation should also include a discussion of a range of renewable energy opportunities in the agricultural sector. Every 150 acres of trees or vines, where insolation is sufficient, could have a 30 kW solar PV generator. Produce coolers could use parabolic troughs on their roofs to feed absorption chilling; tomato processors could get heat and electricity from concentrated solar technology, as could cattle feedlots. Gasification of almond,walnut, and pistachio prunings could make hullers self-sufficient in electricity, heat, and possibly diesel fuel. Digestion of agricultural waste such as pistachio hulls can produce biomethane. With these and other technologies, California's agricultural sector can produce huge quantities of renewable energy without growing crops to do so.
2) A good use of carbon fee revenues would be to reward farmers for building soil carbon. Conservation tillage(CT) keeps root mass and some crop residue carbon in the soil, whereas conventional tillage opens the soil and releases CO2 to the atmosphere. Because CT reduces the number of tractor operations, diesel fuel is saved, reducing diesel emissions. Carbon build up in the soil also increases moisture retention and decreases the need for irrigation, but this benefit requires four to five years of CT to take effect. Hence there is a lag in water savings and crop yields as carbon content in the soil builds. The cost of more

powerful tractors and new implements to transition to conservation tillage is another barrier to adopting CT. An ARB incentive to adopt conservation tillage would help reduce diesel emissions, fertilizer and pesticide emissions, emissions associated with pumping water, and would help sequester carbon.
3) I would like to see the Scoping Plan require that IOU power companies pay Renewable Energy Credits of $0.05 per kWh to fulfill their Renewable Portfolio Standard obligations to farmers who produce on-farm renewable energy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 16:25:05

No Duplicates.

Comment 13 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Elizabeth
Last Name: Gavric
Email Address: elizabethg@car.org
Affiliation:

Subject: Comments re: Preliminary Recommendations - Electricity and Commercial/Residential Sector
Comment:

```
Please see attached document for comments.
Thank you,
Elizabeth Gavric
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/14-arb_draft_scoping_plan_-_car_comments.pdf

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

Date and Time Comment Was Submitted: 2008-07-16 14:47:05

No Duplicates.

Comment 14 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Rebecca
Last Name: Overmyer-Velazquez
Email Address: rovermyer@whittier.edu
Affiliation:

Subject: Cap and Trade
Comment:

CARB should not give industries free pollution permits---polluters should have to pay for their emissions. CARB should study very carefully how the European Union made the mistake of giving away pollution credits based on self-reporting by industries of their emissions---we don't have the luxury of making this same mistake in California! Rather than allowing polluters to buy offsets, there must be strong regulation of GHGs. I was dismayed to hear in the public workshop that caps will be regulated but that these caps will need to be supplemented with credits. Why not just regulate low caps to begin with, enforce and monitor them rigorously, and provide tax credits to those polluters who truly make progress in reducing their emissions?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-16 15:45:57

No Duplicates.

Comment 15 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Liz
Last Name: Yager
Email Address: liz.yager@comcast.net
Affiliation:

Subject: economic model - social equity
Comment:

```
I am seriously concerned by the inequitable impact of the climate
crisis on our citizens and ask that you please consider these
recommendations for inclusion in the Final Scoping Plan:
-   that the State auction 100% of permits under the cap.
Polluters should pay for their emissions, not be given free
permits that subsidize coal and prolong the transition to cleaner
energy.
-   that the Scoping Plan specify that all auction revenues will
be used to provide a Dividend to compensate consumers.  With
gasoline at $4.50/gallon and rising electricity prices, helping
consumers deal with fuel and electricity costs is the best use of
auction revenues.
-    I support CARB's proposal for Carbon Fees on fossil fuel
companies to help fund CARB's implementation of AB32.    Carbon
Fees can also provide funding sources for clean technologies,
green jobs, energy efficiency programs, and more.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-17 10:11:20

No Duplicates.

Comment 16 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Alexander
Last Name: Clayton
Email Address: AlexRClayton@gmail.com
Affiliation: Sierra Club

Subject: Carbon Offsets
Comment:

I am pleased CARB is taking a cautious approach to offsets. Any offsets should be limited in number and subjected to rigorous criteria.

I am opposed to providing free offsets to polluters. The polluters pay principle must be put into action. I pay to offset my VMTs, so why should businesses get them for free? They shouldn't – they should be sold, with the money funding conservation efforts and renewable energy projects.

I also oppose trading between sources of carbon pollution and sinks, like forests, that store carbon. The ability of forests to store carbon should not become a justification for maintaining higher emissions of air pollution. We need both 80% reductions in domestic CO2 emissions and strong programs to enhance carbon sinks; we should not "trade" them off against each other.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-17 17:40:10

No Duplicates.

Comment 17 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Timi
Last Name: Most
Email Address: timimost@ix.netcom.com
Affiliation:

Subject: Regarding Scoping Plan
Comment:

California Interfaith Power and Light is an interfaith environmental ministry dedicated to working with California's faith community to address the grave threat to humanity and all Creation posed by global warming. CIPL has more than 500 member congregations in California and is part of a national Interfaith Power and Light movement operating in 26 states.

In 2006, California Interfaith Power and Light worked for passage of AB 32. Our member congregations have prevented over 20 million pounds of carbon dioxide emissions from entering the atmosphere through energy efficiency efforts.

California Interfaith Power and Light wants to make sure that implementation of AB 32 is just, fair, and effective. To that end, I, Timi Most as a member of CIPL and Christ Church Congregation in Portola Valley, urge the Air Resources Board to embrace the following elements in its final Scoping Plan and in any collaboration between California and the Western Climate Initiative:

1. Ensure that any plan to distribute carbon emission allowances and revenues is done in a fair and equitable manner.

2. Auction 100% of the allowances and designate revenues to assist low-income people in adapting to AB 32 through energy efficiency programs, transportation alternatives, and bill payment assistance. Funds should also be used for green jobs training and clean energy investments. CIPL does not support free giveaways of allowances. CIPL's position is that polluters should pay the full cost.

4. Ensure that working people can transition to new green jobs, and that worker retraining is available for that purpose.

5. Given that the Draft Scoping Plan includes working with the Western Climate Initiative partners on a cap-and-trade program, ensure that the WCI's scope includes transportation fuels in order to maintain the environmental integrity of WCI and to achieve the lowest cost economy-wide emissions reductions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-18 17:05:41

No Duplicates.

Comment 18 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Ann
Last Name: Schneider
Email Address: Ann.Schneider@sierraclub.org
Affiliation: Sierra Club NationalZero Waste Committee

Subject: Exclude Waste-to-Energy and Landfill Gas in Renewable Energy Standards
Comment:

```
Hi:

I ran out of time in my 2 minutes at the microphone on July 19th
to express the other great concern of the Sierra Club National
Zero Waste Committee, the possible inclusion of Waste-to-Energy
(WtE) and landfill gas to energy (LFGTE) into California's
Renewable Energy Standards (RES).  I couldn't find a description
of what qualifies, or doesn't, in the draft scoping plan.

Twelve states alredy exclude WtE from their RES and we would like
to see California join this list of leadership states.  WtE is in
direct competition with composting and recycling. And it is by far
more beneficial to society to recover materials for reuse,
recycling and composting than to use them to create energy.

The "Stop Trashing the Climate" study discussing this issue in
great detail  wwww.stoptrashingtheclimate.org has the full
report.

As for LFGTE, the Sierra Club is working on new policy so I can't
state that excluding LFGTE is Club policy.  But as I said in my
spoken comments, if there is any chance that the systems needed to
create high enough concentrations of methane, have additional and
adverse problem of increasing the release of fugitve methane and
accompanied VOCs with HAPS, then until proven one way or another,
the inclusion of LFGTE in the RES could be very detrimental to
people living near and downwind of landfills and to curbing
greenhouse gas emissions.

Please feel free to contact me if you have any questions.

Thank you.

Ann Schneider
Chair, National Zero Waste Committee
Sierra Club
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-20 13:27:52

No Duplicates.

Comment 19 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Ken
Last Name: Johnson
Email Address: kjinnovation@earthlink.net
Affiliation:

Subject: Carbon Fee
Comment:

```
CARB is evaluating carbon fees as an alternative to cap-and-trade,
but disfavors carbon fees on the grounds that "they provide less
certainty in California’s ability to meet specific emission
targets, as required under AB 32" (Draft Plan, page 42). However,
carbon fees and cap-and-trade are neither mutually exclusive nor
incompatible policy options. A carbon fee would provide greater
certainty of meeting California’s AB 32 goal, and could
incentivize early action in advance of post-2020 regulations, if
it is implemented as a price floor in the context of cap-and-trade
(i.e., as a reservation price in an allowance auction).
...
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Attachment: www.arb.ca.gov/lists/sp-design-ws/21-kenjohnson_2008_07_22.pdf

Original File Name: KenJohnson_2008_07_22.pdf

Date and Time Comment Was Submitted: 2008-07-22 21:19:17

No Duplicates.

Comment 20 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Steven
Last Name: Moss
Email Address: steven@moss.net
Affiliation: San Francisco Community Power

Subject: Comment on Inclusion of Low Income Families and Small Businesses in the AB 32 Framework
Comment:

```
San Francisco Community Power, www.sfpower.org, is delighted to
submit the attached comments, which focus on enabling vulnerable
communities to participate in AB32's cap and trade program.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/23-c_t_ab32_scoping_plan_comments.doc

Original File Name: C&T AB32 Scoping Plan Comments.doc

Date and Time Comment Was Submitted: 2008-07-28 17:54:43

No Duplicates.

Comment 21 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Patricia
Last Name: Grenfell
Email Address: pgrenfell@yahoo.com
Affiliation:

Subject: AB32
Comment:

```
Please STRENGTHEN the plan for AB 32.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 19:07:32

No Duplicates.

Comment 22 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Michael
Last Name: Ho
Email Address: aaronkwik@hotmail.com
Affiliation:

Subject: California needs to focus on Global Warming
Comment:

```
We need more Zero-Emission Vehicles in the market.  As we've seen
in the increase in hybrid buyers & decrease in SUV buyers,
consumers want to move away from the high prices, & ZEVs could do
the job!  Require car companies to sell hundreds of thousands of
them, instead of the current small number.  Furthermore, change
how lands are being developed so people would have to drive less
distances.  Thank you.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 21:10:12

No Duplicates.

Comment 23 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Philip
Last Name: Liberman
Email Address: philipliberman@yahoo.com
Affiliation:

Subject: AB 32 Comments
Comment:

```
* Make polluters pay for their emissions of greenhouse gases, using
the resulting revenues to promote clean energy and aid
low-income consumers. Limit sharply and verify any offsets. Do not
link our program to any states with weaker emission standards.

* Include stronger measures to reform land use planning in ways
that reduce vehicle miles traveled.

* Promote and enable Community Choice Electricity Aggregation
(CCA), which lets communities pool their buying power to
generate clean power.

* Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed
level of 7500 ZEVs.

* Put Zero Waste front and center: increase recycling by
businesses, mandate building facilities to compost all green
waste, and require producers to take responsibility for the
end-of-life disposition of their products.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 21:31:16

No Duplicates.

Comment 24 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Yichuan
Last Name: Pan
Email Address: ypan1@sbcglobal.net
Affiliation:

Subject: Please Promot Plant-Based Diet
Comment:

After reading the Climate Change Draft Scoping Plan - a framework for change, I am pleased that the state leadership is committed for the state of California to once again play a leading role in addressing global warming and climate change.

However, I am puzzled by the fact that the contribution of the livestock sector to greenhouse gas emissions and global warming is largely watered down. For example, on your web-page, Air Pollution and What You Can Do/Fifty Things You Can Do/, I could not even find one thing related to the benefits of keeping a plant-based or vegetarian diet.

I question the presentation of the pie-chart on page 7 of the Plan. According to a report published by the United Nations Food and Agriculture Organization in 2006(1)(2), the livestock sector worldwide generates more greenhouse gas emissions as measured in CO2 equivalent than transportation. When emissions from land use and land use change are included, the livestock sector accounts for 9 percent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 percent of human-related nitrous oxide, which has 296 times Global Warming Potential (GWP) of CO2. Most of this comes from manure. And it accounts for respectively 37 percent of all human-induced methane (23 times GWP of CO2), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain. Producing one pound of meat requires 16 pounds of grains, and much energy is required for animal food preparation and transportation. Therefore, I would appreciate if you could recalculate the data to include all these effects of the livestock sector, and regenerate the pie-chart on page 7. I feel that only in this way the contribution of the livestock industry to global warming is correctly presented.

The 37 million residents of California consume a huge quantity of meat per day that results in a lot of greenhouse gas emissions. If a large part or all of our residents adopt plant-based diet, the greenhouse gas emissions will be cut tremendously. Besides, converting to a plant-based diet is an action that every honored citizen can take, with no requirement of new technology that yet to be invented. Nobel Prize laureate, the chair of the Intergovernmental Panel on Climate Change (IPCC), plead for people around the world to tame their carnivorous impulses and stay away from meat in order to save our planet(3). And, experts promoted a plant-based diet not only to fight global warming, but to benefit

public health as well(4).
We are at an urgent time, so urgent actions are necessary. Please revise the Plan to more meaningfully reflect the contribution of the livestock industry to global warming, and to include plans to promote plant-based diet. The state leadership can take bold actions. And the following list includes a few examples

- To reduce and eventually eliminate subsidies to the livestock industry. It makes no sense to use taxpayer's money to support the meat industry which generates lots of pollution and causes health problems. Instead, the money can be used to support green food or organic food to benefit the environment and people's health.
- To educate people the benefits of plant-based diet by running advertisement or by other means.
- To mandate that school lunch provides options for plant-based meals.

References:

1.http://www.fao.org/newsroom/en/news/2006/1000448/index.html (Livestock a major threat to environment)
2.http://www.fao.org/docrep/010/a0701e/a0701e00.htm (LIVESTOCK'S LONG SHADOW)
3.http://afp.google.com/article/ALeqM5iIVBkZpOUA9Hz3Xc2u-61mDlrw0Q (Lifestyle changes can curb climate change: IPCC chief)
4.http://www.cnn.com/2007/TECH/science/11/12/global.warming.diet.ap/index.html (Experts promote the global warming diet)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 23:09:07

No Duplicates.

Comment 25 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Marilyn
Last Name: Jasper
Email Address: mjasper@accessbee.com
Affiliation:

Subject: AB 32 CA Global Warming SOLUTIONS Act-2006
Comment:

First, polluters must be mandated to reduce their emissions of any greenhouse gases to the lowest levels possible; emission standards must not be linked to programs in other states. Enforcement for violations must be well funded as well as swift, strict, consistent and final, with repeat offenders receiving exponentially stronger penalties. After x number of offenses (single digit), polluters must be banned/restricted from continuing the polluting activity. Connected to this, all polluters must pay for their emissions contribution to greenhouse gases.

Land use planning must be severely reformed with reduction of vehicle miles traveled given top consideration. Sprawling developments with little-to-no, or inadequate, public transportation must not be allowed. If jurisdictions insist on allowing such developments, their portion of state funding must be curtailed accordingly.

In the '40's and '50's, families lived well in homes that were under 1,500 square feet (see older neighborhoods in downtown Sacramento, for example). A 2,000 plus square foot home, or larger McMansion, with vaulted ceilings and huge cubic feet of interior space requiring heating and cooling must be discouraged to reduce energy consumption or pay a premium building fee. Solar panels, insulation, etc., may help, but the resources used to construct such monoliths must be factored in considering any development incentives or fees.

Zero Waste, with convenient and prominent recycling, must be implemented in all communities. All producers must take responsibility for end-of-life disposition (including pharmaceuticals, packaged food manufacturers, clothing manufacturers, etc.).

CARB must error on the side of stronger, rather than weaker, requirements to solve global warming impacts. Once resolved, if necessary, regulations can always be eased, but a bold effort is needed now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 07:06:22

No Duplicates.

Comment 26 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Srilata
Last Name: Thirunagari
Email Address: srilata.t@gmail.com
Affiliation:

Subject: Reduce Global Warming the fastest way
Comment:

```
The fastest way to reduce global warming is to eat vegetarian.
Numerous studies have shown that meat eating is the culprit to
quickly using up the Mother Earth's resources eg. land, water etc.
There is tremendous energy, resources and food used for raising
cattle, pigs etc. Instead these can be spent in a more efficient
way to feed the hungry by feeding grain directly to the starving
people of the world. Other reasons for eating vegetarian are
compassion towards animals, health, moral reasons etc. "No animal
has to die in order for one to live" a famous vegan once said. A
united nations study has proved that by eating vegetarina we can
reduce 80% of global warming. Let's introdus a carbon tax on meat
and cut down on meat subsidies so at least folks will buy less
meat and start eating more vegetables and fruits. Other useful
links are: http://www.goveg.com/environment-globalwarming.asp
http://www.goveg.com/environment.asp
http://al.godsdirectcontact.org/your_food/
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 09:48:35

No Duplicates.

Comment 27 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Kim
Last Name: Floyd
Email Address: kimffloyd@fastmail.fm
Affiliation:

Subject: Make Polluters Pay
Comment:

```
• Make polluters pay for their emissions of greenhouse gases, using
the resulting revenues to promote clean energy and aid low-income
consumers. Limit sharply and verify any offsets. Do not link our
program to any states with weaker emission standards.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 11:45:53

No Duplicates.

Comment 28 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Rebecca
Last Name: Martin
Email Address: iamwhatyam@hotmail.com
Affiliation:

Subject: Suggestion
Comment:

```
·        Make polluters pay for their emissions of greenhouse
gases, using the resulting revenues to promote clean energy and
aid low-income consumers. Limit sharply and verify any offsets. Do
not link our program to any states with weaker emission standards.

·        Include stronger measures to reform land use planning in
ways that reduce vehicle miles traveled.

·        Promote and enable Community Choice Electricity
Aggregation (CCA), which lets communities pool their buying power
to generate clean power.

·        Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed
level of 7500 ZEVs.

·        Put Zero Waste front and center:  increase recycling by
businesses, mandate building facilities to compost all green
waste, and require producers to take responsibility for the
end-of-life disposition of their products.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 11:59:04

No Duplicates.

Comment 29 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Randi
Last Name: Hetrick
Email Address: Livelihood@msn.com
Affiliation:

Subject: AB 32 Program Design
Comment:

```
These are excellant proposals and move toward cleaner air and
better energy use.  My one concern is taxing companies based on
carbon emmissions at this time.  However, business needs to take
the lead in recycling and using more fuel efficent vehicles.

I am also in favor of proceeding with developing more nuclear
energy.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 12:20:42

No Duplicates.

Comment 30 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Benjamin
Last Name: Etgen
Email Address: etgenb@calweb.com
Affiliation:

Subject: Strengthen Implemention of AB 32
Comment:

```
Include stronger measures to reform land use planning in ways that
reduce vehicle miles traveled.

Also make sure that your modeling of vehicle trips takes into
account the increase in polution from private transportation as
the govenor's transit cuts make more people drive.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 12:28:43

No Duplicates.

Comment 31 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Dorothy
Last Name: Littlejohn
Email Address: dlittlejohn1@cox.net
Affiliation: Sierra Club

Subject: AB 32
Comment:

```
Make polluters pay for their emissions of greenhouse gases, using
the resulting revenues to promote clean energy and aid low-income
consumers. Limit sharply and verify any offsets. Do not link our
program to any states with weaker emission standards.

Include stronger measures to reform land use planning in ways that
reduce vehicle miles traveled.

Promote and enable Community Choice Electricity Aggregation (CCA),
which lets communities pool their buying power to generate clean
power.

Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed
level of 7500 ZEVs.

Put Zero Waste front and center:  increase recycling by
businesses, mandate building facilities to compost all green
waste, and require producers to take responsibility for the
end-of-life disposition of their products.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 15:33:52

No Duplicates.

Comment 32 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Aaron
Last Name: Lehmer
Email Address: aaron@ellabakercenter.org
Affiliation: Ella Baker Center for Human Rights

Subject: AB 32 Scoping Plan Comments from Ella Baker Center
Comment:

```
Please see the attached document.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/35-ab_32_scoping_plan_statement.doc

Original File Name: AB 32 Scoping Plan Statement.doc

Date and Time Comment Was Submitted: 2008-07-29 16:30:51

No Duplicates.

Comment 33 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: William
Last Name: Joyce
Email Address: joycewxyz@yahoo.com
Affiliation: Sierra Club

Subject: AB 32 Program Design - Stronger Enforcement
Comment:

```
Make polluters pay for their emissions of greenhouse gases, using
the resulting revenues to promote clean energy and aid low-income
consumers. Limit sharply and verify any offsets. Do not link our
program to any states with weaker emission standards.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 17:47:31

No Duplicates.

Comment 34 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Mary
Last Name: Fullwood
Email Address: maryf@best1.net
Affiliation: Sierra Club, Surfrider

Subject: AB-32
Comment:

```
While CARB's Draft Scoping Plan includes a number of strong
measures, including a call for 33% of electricity to be generated
by clean, renewable energy by 2020, the draft needs significant
strengthening before it will be up to meeting the challenge of
combating global warming.  Please consider the following:
-  Make polluters pay for their emissions of greenhouse gases,
using the resulting revenues to promote clean energy. Limit
sharply and verify any offsets. Do not link our program to any
states with weaker emission standards.
-  Include stronger measures to reform land use planning in ways
that reduce vehicle miles traveled.
-  Promote and enable Community Choice Electricity Aggregation
(CCA), which lets communities pool their buying power to generate
clean power.
-  Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014.
-  Put Zero Waste front and center:  increase recycling by
businesses, mandate building facilities to compost all green
waste, and require producers to take responsibility for the
end-of-life disposition of their products.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 19:45:03

No Duplicates.

Comment 35 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Lilian
Last Name: Lee
Email Address: lilian2004@gmail.com
Affiliation:

Subject: add livestock sector to the greenhouse gas sources
Comment:

I was excited for your fast response on the hot issue of global warming, and encouraged by your efforts.

I would suggest adding a livestock sector as one of the greenhouse gas sources. According to Senior UN Food and Agriculture Organization (FAO) official Henning Steinfeld, "Livestock are one of the most significant contributors to today's most serious environmental problems …", and "Urgent action is required to remedy the situation." The reasons include:

1. " …the livestock sector generates more greenhouse gas emissions as measured in CO2 equivalent – 18 percent – than transport. It is also a major source of land and water degradation."

2. "It generates 65 percent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure. And it accounts for respectively 37 percent of all human-induced methane (23 times as warming as CO2), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain."

3. "Livestock now use 30 percent of the earth's entire land surface, mostly permanent pasture but also including 33 percent of the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is a major driver of deforestation, especially in Latin America where, for example, some 70 percent of former forests in the Amazon have been turned over to grazing."

4. "The livestock business is among the most damaging sectors to the earth's increasingly scarce water resources, contributing among other things to water pollution, euthropication and the degeneration of coral reefs. The major polluting agents are animal wastes, antibiotics and hormones, chemicals from tanneries, fertilizers and the pesticides used to spray feed crops. Widespread overgrazing disturbs water cycles, reducing replenishment of above and below ground water resources. Significant amounts of water are withdrawn for the production of feed."

For more detail information about livestock, please click the below link: www.fao.org/newsroom/en/news/2006/1000448.

Livestock sector is a major greenhouse gas source. Please do not

ignore it. Thanks for your attention.

Lilian

Attachment: www.arb.ca.gov/lists/sp-design-ws/38-toarb-072908.doc

Original File Name: toARB-072908.doc

Date and Time Comment Was Submitted: 2008-07-29 22:08:22

No Duplicates.

Comment 36 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Cheryl
Last Name: McKinney
Email Address: mckinney.public@gmail.com
Affiliation: California Sierra Club

Subject: carbon offsets / strong standards
Comment:

```
Make polluters pay for their emissions of greenhouse gases, using
the resulting revenues to promote clean energy and aid
low-income consumers. Limit sharply and verify any offsets. Do not
link our program to any states with weaker emission standards.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 08:01:27

No Duplicates.

Comment 37 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Brent
Last Name: Eidson
Email Address: beidson@sandiego.gov
Affiliation: City of San Diego

Subject: Increased costs and inconsistencies with air districts
Comment:

```
1) There is a potential for some of the measures (i.e., the carbon
tax) to result in increased construction costs which would
definitely impact future project budgets.  However, it is
currently impossible to quantify the budgetary impacts to Capital
Improvement Projects.
2) Currently, there is not a consistent approach or similar level
of engagement from the air districts within the State, and the
Scoping Plan is silent on what their role will be in the
implementation process.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 11:05:35

No Duplicates.

Comment 38 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Mike
Last Name: Zucksworth
Email Address: lamike05@yahoo.com
Affiliation: Sierra Club

Subject: General Comments to Draft Scoping Plan-AB32
Comment:

```
Emissions of Green House Gases:
Make polluters pay for their emissions of greenhouse gases, using
the resulting revenues to promote clean energy and aid low-income
consumers. Limit sharply and verify any offsets. Do not link
California's program to any states with weaker emission
standards.

Land Use Planning:
Include stronger measures to reform land use planning in ways that
reduce vehicle miles traveled.
Clean Power and Community Choice:
Promote and enable Community Choice Electricity Aggregation (CCA),
which lets communities pool their buying power to generate clean
power.

Zero-Emission Vechicles:
Mandate that auto companies sell hundreds of thousands of
Zero-Emission Vehicles (ZEVs) by 2014, rather than the proposed
level of only 7,500 ZEVs.

Green Building:
Put Zero Waste front and center:  increase recycling by
businesses, mandate building facilities to compost all green
waste, and require producers to take responsibility for the
end-of-life disposition of their products.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 13:41:38

No Duplicates.

Comment 39 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Michael
Last Name: Molamphy
Email Address: youreyesonlymjm@yahoo.com
Affiliation:

Subject: Air Pollution control/lobal warming
Comment:

```
I favor the strongest possible actions to reduce air pollution.
Increased use of carpooling, enforced by more carpool lanes can
have the quickest impact. We must break the bad habits of the
commuters driving long distances, alone, in 2 or 3 ton gas hogs.
Consult the Sirra clubs recommendations for appropriate actions.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 17:55:33

No Duplicates.

Comment 40 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Vicki
Last Name: Mayster
Email Address: buman-mayster@sonic.net
Affiliation:

Subject: Draft AB 32 Scoping Plan - recommendations
Comment:

Dear CARB,

I appreciate your work on the draft AB32 Scoping Plan to reduce California's GHGs.

I think you goals for Calif. to increase renewable energy and reduce vehicle miles traveled are particularly important. I would immediately use renewable energy sources were they more readily available.

I'm asking you to also include these recommendations for inclusion in the Final Scoping Plan:

* Calif. should auction 100% of permits under the cap. Polluters should pay for their emissions, not be given free permits that subsidize coal. This prolongs the transition to cleaner energy, omething we cannot afford.

* The Scoping Plan should specify that all auction revenues will be used to provide a dividend to compensate consumers for the higher energy and consumer goods prices that have and will continue to come as we move to a low-no carbon economy.

Helping consumers deal with fuel and electricity costs is the best use of auction revenues, because it will help cement consumer political support for this program and keep it moving ahead.

* I support CARB's proposal for Carbon Fees on fossil fuel companies to help fund CARB's implementation of AB32. I know you will get strong opposition from many large companies and interests on this. Please inlcude carbon fees to provide funding for clean technologies, green jobs, energy efficiency programs, and more.

Thank you for your attention and concern to these items.

Sincerely,

Vicki Mayster

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 18:03:04

No Duplicates.

Comment 41 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Frank
Last Name: Gallivan
Email Address: fgallivan@gmail.com
Affiliation:

Subject: Increase Transportation and Land Use Strategies in Scoping Plan
Comment:

```
    * I support CARB's inclusion of better community design and
reducing VMT, but the proposed reduction target for land use and
transportation of 2 million metric tons (MMT) of greenhouse gases
is way too low. The target should be at least 9-10 MMT.
    * The plan has omitted critical measures to create a world
class public transportation system and encourage innovative
congestion-relief programs that can ease people's commutes while
reducing emissions.
    * Rather than adopting a one-size-fits-all approach, CARB
should set firm targets for regions and authorize regions and
localities to choose from a suite of policy tools to achieve the
targets.
    * CARB should adopt a series of key policy tools currently
under consideration, including the Indirect Source Rule,
Pay-As-You-Drive Insurance, Congestion Pricing, and Incentive
Programs. These tools will help regions and localities achieve the
targets while generating revenues to implement greenhouse gas
reduction strategies and programs.
    * The plan should make it a top priority to invest in and
sustain public transportation and programs to improve
transportation efficiency and reduce congestion.
    * Cities, counties and regions should be given incentives to
conserve forests and working landscapes that sequester carbon,
provide local food, reduce wildfire hazard and help native plants
and animals adapt to a changing climate.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 22:02:34

No Duplicates.

Comment 42 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Laurie
Last Name: Williams
Email Address: williams.zabel@gmail.com
Affiliation: www.carbonfees.org

Subject: Carbon Fees not cap-and-trade; also Request for Extension
Comment:

My husband, Allan Zabel and I have written 2 pieces regarding this issue. Please consider our explanations of why carbon fees are the more efficient and effective market mechanism in the 2 pieces below (1)our website at www.carbonfees.org, and (2) our July 11th editorial, imported below. In summary, we believe that cap-and-trade is a flawed strategy for addressing climate change. The Acid Rain experience does not prove that cap-and-trade is applicable to climate change. The two situations are completely distinguishable. With climate change we face the need for massive new infrastructure and innovation (as opposed to Acid Rain, where an easy fuel switch was available); we also have a lack the comprehensive accurate monitoring of greenhouse gases that was available for the contaminants of concern in Acid Rain. Finally Acid Rain did not allow outside offsets. All of this makes the applicability of the Acid Rain experience to climate change a myth.

Also attached as a PDF please find a visual explanation of how carbon fees work, and a request for additional public education and an extension of the comment period on this issue.

1. Please see our May 4th, 2008 Open Letter to Congress at www.carbonfees.org. While this is not aimed at California and the AB 32 process, the same arguments apply. This website also provides additional information on our credentials as public sector environmental enforcement attorneys and references for the arguments that we make.

2. Please also consider the arguments in the following piece: Cap & Trade - Misplaced Confidence (published in California Energy Circuit on July 11, 2008) which addresses AB 32 and the upcoming decision by the California Air Resources Board.

By Laurie Williams & Allan Zabel

As poles and glaciers melt, permafrost thaws and oceans acidify from our ever-increasing greenhouse gas emissions, the question of whether a carbon cap-and-trade program or carbon fees would provide swifter, more equitable and certain emissions reductions is increasingly urgent. Based on our experience as environmental enforcers (including Allan’s experience with cap-and-trade programs), we believe that the California Air Resource Board’s confidence in cap-and-trade is misplaced and that carbon fees provide the more effective and efficient path to the goals of AB 32, California’s landmark climate protection law.

As long expected, California’s recently released AB 32 Draft Scoping Plan relies heavily on “cap-and-trade” to reduce the state’s significant contributions to global greenhouse gas emissions. The draft minimizes the value of a system of “carbon fees.” The Air Resources Board justifies its preference by calling cap-and-trade a more certain route to meeting AB 32’s requirement to reduce California’s emissions 30 percent below “business as usual” by 2020.

However, cap-and-trade has serious downsides.

Unless all cap-and-trade elements, including offsets, are limited to systems with accurate emissions measurement, the cap on total emissions will likely be inflated and claimed reductions exaggerated. While the emissions of large electrical generating facilities with continuous emission monitoring systems can be accurately tracked, many other sources of emissions and offsets cannot be as closely monitored.

If these less-accurately-measured sources participate, the integrity of the cap-and-trade program will be undermined, as will the certainty in reductions that CARB seeks. In addition, even if the market is limited to facilities with continuous emission monitors, this will create artificial scarcity that is likely to result in disruptions and unfairness, as initial and future allocations of the right to emit are distributed and traded.

A preview of such disruptions was provided by the manipulations that created the California energy crisis early in this decade. This potential was also demonstrated in a recent simulation at the University of California at Berkeley’s Haas School of Business, in which students gamed a carbon-trading market for individual gain, leading to scarcity and high prices. This potential for market manipulation could contribute to undesirable price volatility. The resulting lack of price predictability in a cap-and-trade system (specifically, the lack of certainty that the price of energy from fossil fuels will exceed the price of green energy) reduces the incentive for the substantial investments in the new infrastructure and innovation necessary to provide alternative energy at affordable prices.

The history of cap-and-trade demonstrates the limitations of the state’s proposal.

The so-called “cap-and-trade” of the federal acid rain program in no way resembles the complex challenge we face in reducing greenhouse gases. Under the program, all facilities had monitors, so the system had the integrity of accurate measurement. There was relatively little trading, particularly outside of any given corporation and its subsidiaries. Trading in the acid rain program primarily meant that some corporations complied with the gradual reductions in total sulfur emissions by averaging among several of their facilities. In addition, there was no significant need for investments in new technologies or innovation in order to reduce sulfur. All that was needed--and what happened--was a “fuel switch” from high-sulfur coal, to the low-sulfur coal found in Wyoming’s Powder River Basin.

In contrast, another cap-and-trade program failed spectacularly in Los Angeles. Known as RECLAIM (the Regional Clean Air Incentives Market), it was aimed at reducing ground level ozone. In RECLAIM,

despite the presence of monitors, an inflated cap delayed most emission reductions for over seven years. At the end of that time, the market collapsed and the necessary control technology was required by regulation.

Similarly, attempts to design an effective carbon cap-and-trade system have failed under the Kyoto Protocol--a 1997 international accord to cut greenhouse gas emissions which the U.S. never ratified. Utilities and other sources have underreported their emissions, purchased flawed offsets, driven up prices, reaped billions in undeserved profits and generally failed to produce promised emission reductions.

Despite cap-and-trade’s enormous disadvantages, it is ardently supported by two disparate groups. This first consists of those who stand to profit, whether from trading, certifying offsets and/or delaying the phase-out of fossil fuels. The second includes those who truly want rapid reductions, but believe that the greater efficiency and transparency of carbon fees is politically unattainable and/or fail to understand that the vulnerabilities of cap-and-trade to manipulation and fraud will make the “cap” illusory.

The advantages of carbon fees, in contrast, include simplicity and transparency. For instance, the U.S. Congressional Budget Office stated in its February 2008 report: “A tax on emissions would be the most efficient incentive-based option for reducing emissions and could be relatively easy to implement.” These advantages include that it is much easier to effectively trace and impose a fee on all fossil fuels at the point of importation or extraction than it is to accurately measure all greenhouse gas emissions.

By phasing in gradually increasing carbon fees that would go up each year until the price of energy made from fossil fuels exceeds the price of clean technologies, carbon fees would create the certainty needed to spur investment in post-fossil fuel energy sources. A per-capita rebate of these carbon fees to all California taxpayers would cushion the impact of higher energy prices, particularly for low and middle income taxpayers, during the transition to the post-fossil fuel economy. The relative certainty provided by escalating carbon fees and the investments they would foster are likely to catapult California and the nation into a leadership position in green technology and set a roadmap for the rest of the world on how to move beyond the ineffective policy of cap-and-trade.

As CBO acknowledges, the main barrier to the carbon fees approach is a lack of political acceptability. It in turn is based on a lack of public education about why carbon fees (and a ban on new coal-fired power plants without sequestration) are our best hope to save our way of life and leave a habitable biosphere to the next generation.

By selecting carbon fees to meet AB 32’s goal, California could lead the nation in effectively and efficiently addressing climate change. While CARB’s draft scoping plan attempts to support its preference for cap-and-trade by indicating that it would fit well with expected cap-and-trade programs by the Western Climate Initiative and the federal government, this justification is unworthy of California’s proud tradition of environmental leadership.

Only if we discuss the urgency of the problem and the most effective solution with friends, families, neighbors and colleagues, and ask them to join us in calling and writing our representatives, can we jump-start the huge outpouring of public participation necessary to make carbon fees the acceptable as well as the wise choice.

--Laurie Williams and Allan Zabel of www.carbonfees.org wrote this editorial as citizens and parents. In May, the two lawyers issued an open letter to Congress urging lawmakers to put their efforts into setting carbon fees in place of a carbon cap-and-trade program. For details about their professional experience and carbon fees approach, see their website.

3. Attached please find a visual providing a chart to demonstrates how the certainty that green energy will become less expensive than fossil fuel energy would affect investment and affordability. Cap-and-trade cannot deliver this same price certainty and hence will not be as effective in moving us to a post-fossil fuel economy.

4. REQUEST FOR EXTENSION:
We believe that an additional period of public education should occur on the issue of carbon fees vs. cap-and-trade, and that there should be an additional comment period on this issue prior to a final decision.

Attachment: www.arb.ca.gov/lists/sp-design-ws/45-why_carbon_fees_work_7-28-08.pdf

Original File Name: Why Carbon Fees Work 7-28-08.pdf

Date and Time Comment Was Submitted: 2008-07-30 22:56:07

No Duplicates.

Comment 43 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Kari
Last Name: Dohn
Email Address: kdohn@apx.com
Affiliation: Managing Director

Subject: APX Comments on Draft Scoping Plan
Comment:

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comments attached
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Attachment: www.arb.ca.gov/lists/sp-design-ws/46-apx.comments.carb.7.31.v1.doc

Original File Name: apx.comments.carb.7.31.v1.doc

Date and Time Comment Was Submitted: 2008-07-31 07:59:54

No Duplicates.

Comment 44 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: michele
Last Name: perrault
Email Address: michele.perrault@sierraclub.org
Affiliation: citizen and volunteer Sierra Club

Subject: comments on ARB scoping draft
Comment:

Over all the plan is moving in the right direction. I support the Sierra Club California comments of which I have followed and commented on thier development. The comemnts would strenghen the final plan.

As International Vice Presidnet of the Club I would particularly point out the Club's concerns in the sections dealing with cap and trade and concerns for equity interests as well as hope California will not extend the offsets and trading internationally at this time. I join concenrs as to avoiding tagreements for any WCI activities that allow looser requirements for offsets.

As a citizen involved in my local town efforts to reduce emmissions as well as watching the very large proposed development for the Concord Weapons station I feel that more can be done ot foce local government and builders to develop in a more friendly fashion.

The draft plan needs more specifics on how industries will be required to look at alternatives to present high emmissions. Where feasable there should be consideration of changes needed to address the carbon emmssions released by products imported into the state for use by the Califronia consumers especially as they related to products made overseas by Califronia based companies.

I would like to see more assessment of the opportunities provided by Community Choice Aggregation and an increase on opportunities gained from placing greater priority on zero waste includding requiring producers to take responsibility for end of life dispositioin of thier products.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 09:36:55

No Duplicates.

Comment 45 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

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

Comment 46 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Fiji
Last Name: George
Email Address: fiji.george@elpaso.com
Affiliation: El Paso Corporation

Subject: Comments from El Paso on the DRAFT Scoping Plan
Comment:

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El Paso Corporation (El Paso) respectfully submits the attached
comments on the Climate Change Draft Scoping Plan a framework for
change (Scoping Plan) released on June 26, 2008.
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Attachment: www.arb.ca.gov/lists/sp-design-ws/49-draft_scoping_plan_el_paso_comments_v5final_.pdf

Original File Name: DRAFT Scoping Plan El Paso Comments_v5final_.pdf

Date and Time Comment Was Submitted: 2008-07-31 10:53:19

No Duplicates.

Comment 47 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: paula
Last Name: carrell
Email Address: chacocyn@earthlink.net
Affiliation:

Subject: carbon fees
Comment:

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Polluters -- those emitting the greatest amounts of carbon and
other greenhouse gases -- should pay the price for reducing/ending
their emissions.  Polluters Pay makes sense to me.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 13:01:50

No Duplicates.

Comment 48 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Chris
Last Name: Busch
Email Address: cbusch@ucsusa.org
Affiliation: Union of Concernced Scientists

Subject: proposed cap-and-trade program
Comment:

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Please find attached our comments on the proposed cap-and-trade
program.
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Attachment: www.arb.ca.gov/lists/sp-design-ws/51-ucs_program_design_comments_7-31-08.pdf

Original File Name: UCS program design comments 7-31-08.pdf

Date and Time Comment Was Submitted: 2008-07-31 16:18:20

No Duplicates.

Comment 49 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Regina
Last Name: Ames
Email Address: reginaames@yahoo.com
Affiliation:

Subject: Items for the Final Scoping Plan
Comment:

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Dear CARB,

Thank you for your work on the Draft AB32 Scoping Plan to reduce
California's GHGs by 2020, especially in setting goals for the
State to increase renewable energy and reduce vehicle miles
travelled. Please consider these recommendations for inclusion in
the Final Scoping Plan:

- The State should auction 100% of permits under the cap.
Polluters should pay for their emissions, not be given free
permits that subsidize coal and prolong the transition to cleaner
energy.
- The Scoping Plan should specify that all auction revenues will
be used to provide a Dividend to compensate consumers. With
gasoline at $4.50/gallon and rising electricity prices, helping
consumers deal with fuel and electricity costs is the best use of
auction revenues.
- I support CARB's proposal for Carbon Fees on fossil fuel
companies to help fund CARB's implementation of AB32. Carbon Fees
can also provide funding sources for clean technologies, green
jobs, energy efficiency programs, and more.

Sincerely,
Regina Ames
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 16:53:17

No Duplicates.

Comment 50 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Laurie
Last Name: Williams
Email Address: williams.zabel@gmail.com
Affiliation: www.carbonfees.org

Subject: Supplemental Comment - Cap-and-Trade v Carbon Fees
Comment:

Dear CARB, I wanted to supplement my request for reconsideration of using Carbon Fees, with the following request.

To date CARB has performed very limited public education on Carbon Fees as an alternative market mechanism to create the incentives necessary to transition to a post-fossil fuel economy. I request that CARB create a committee to plan and conduct fair and balanced public education on the choice between Cap-and-Trade and Carbon Fees. I am also requesting that you consider including my husband, Allan Zabel and myself on this committee.
Following a period of public education on this choice, I request that you conduct a period of additional public comment on this choice. This is too important a question to go forward without meaningful public education and involvement. I believe that this period of additional public education, involvement and public comment can proceed during the next year, while other AB 32 early actions are undertaken, and thus will not lead to a delay in the emissions reductions mandated by AB 32. As you may be aware studies by both the Congressional Budget Office and the Congressional Research Service have found that Carbon fees (also referred to as Carbon Taxes) have found that Carbon Fees would be an effective market mechanism. These studies have also noted significant problems with the Cap-and-Trade approach.

Thank you for your consideration.
Laurie Williams (510) 390-4224

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 20:53:25

No Duplicates.

Comment 51 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: richard
Last Name: dickinson
Email Address: radskier@hotmail.com
Affiliation: Water and Power Associates, Inc.

Subject: AB 32
Comment:

Mary Nichols, Chairperson July 30, 2008
California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

James Goldstene, Executive Director
California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

Comments on the
California Climate Change Draft Scoping Plan
June 2008 Discussion Draft

The Los Angeles Water and Power Associates (not to be confused with the City of Los Angeles Department of Water and Power) is pleased to offer comments on the above titled Scoping Plan. The Los Angeles Water and Power Associates, Inc. (Associates) is a nonprofit, independent, private organization, incorporated in1971 to inform and educate its members, public officials and the general public on critical water and energy issues affecting the citizens of Los Angeles, Southern California and the State of California. Its membership of approximately 300 is comprised of representatives from private industry, education, municipal service and media.

The Associates comments are general in nature and are provided to invoke reasoned thought and a thorough development, on a rational basis, of future proposals to address climate change. We believe Assembly Bill 32 goals to reach 1990 greenhouse gas emission levels by 2020 are achievable with the participation of a responsible energy community.

The Associates believe that the reliability of the California electric system, e.g. the ability to provide electric energy when and where it is required, needs to be fully vetted in this Scoping Plan. The displacement of the energy from base-loaded power generation facilities with renewable energy can and is being accomplished. The closure or divestiture of base loaded facilities is possible, but you must fully analzye the effects on system reliability? “Traditional” base-loaded facilities have the ability to provide capacity, which is the ability to provide the

energy when it is needed “to keep the lights on.” Most forms of renewable energy do not have that attribute. The Cap and Trade proposal does not address reliability, and energy efficiency and conservation will only incrementally help to reduce the need for capacity. Are new forms of energy storage, backup facilities or other proposals on the horizon to provide the capacity? A robust electric system that will meet the objectives of AB 32, at reasonable customer rates, will need to be valued in the economic and emission benefit models. The Scoping Plan needs to address the reliability of California’s electric system to insure the continued high level of service that Californian’s have been accustomed to.

The Associates recommend that the Scoping Plan assess the issue of fuel switching by Sector. As in all planning efforts, it is prudent to anticipate that not all Sectors identified in the Scoping Plan will achieve the goals of AB 32 in the envisioned time frame. Some Sectors may achieve their allocation by fuel switching, such as through electrification, thereby increasing the requirements on the retail electricity providers. This shift to electricity, while providing substantial benefits, could strain a utility’s ability to achieve its emission reduction goal. Addressing the potential burden that fuel switching by Sector will place on electric utilities, in conjunction with addressing the reliability of California’s electric system, will be integral to the success of the plan.

The Associates support energy efficiency and conservation programs, and we believe that they will continue to be cornerstones in reducing future energy requirements and reducing the need for new power plants. The Associates offer the following comments as a means to achieve the expectations of energy efficiency and conservation. Most of these programs are in place and continue to be expanded. They are, however, possibly the softest and most unreliable elements in the draft. Energy efficiency and conservation programs are really a “power plant”. As such, they should be operated and maintained just as you would any other power plant. Once upfront funds are expended on specific projects, mechanisms need to be in place, including funds and staff, to ensure that the expected results are being met and most importantly being maintained. The expected results need to be verified and not taken for granted based on industry norms or name plate values. If the Scoping Plan is to rely on these programs to produce continued long term results, then they deserve attention and accountability, including ongoing audits, to ensure their success.

The Associates believe that publicly owned electric utilities that have vertically integrated electric systems are uniquely positioned to make decisions on how best to achieve the goals of AB 32. This can be accomplished through implementation of programs identified in the Scoping Plan (aggressive RPS programs, purchasing of less GHG emitting energy to displace existing resources) while maintaining reliability. However, the implementation of the Cap and Trade program could be the most critical element that will affect the success or failure of achieving the goal. It is our belief that the proceeds from an auction must be returned to the utility that purchased the credits. Any other distribution would be no better than a redistribution of monies to others and would jeopardize/frustrate the utility’s ability to fund the programs necessary to achieve the GHG reduction goals. It could be a windfall for some and a disaster for others. Estimates of the

potential for misdirected monies could exceed several hundreds of millions of dollars per year and potentially add significantly to its customers' electric bill. Finally, if a Cap and Trade program is necessary to achieve the desired results, then the Associates would support the West wide approach, in lieu of a California only approach, as identified in the Scoping Plan. Cap and Trade parameters and all related assumptions need to be thoroughly studied and explained because they could produce serious unintended consequences for the public.

In conjunction with a proposed Cap and Trade program, the "first deliverer" approach to determine the carbon reduction requirements for publicly owned vertically integrated utilities is not an appropriate means to determine the type of energy that will be used in California (California only program). If reductions in carbon are required by a specific utility, then it should be up to that utility to make the decision on the type of energy and source that will be needed to meet their obligations. They will make an informed assessment of their needs that will minimize the costs to their customers, and make decisions accordingly. However, California's investor owned utilities are different in that they divested of most of their electric power generating facilities as part of the State's deregulation process. They now purchase a substantial portion of their energy requirements from the wholesale market and may not know for certain the source of their energy. Therefore, to resolve potential conflicts, it may be appropriate to develop a separate tracking system to allow publicly owned utilities to use a "retail provider" approach for the means to determine their carbon reduction requirements. And, as appropriate, establish a separate methodology for privately owned utilities to track their carbon reduction requirements.

The draft plan recognizes the high use of energy for pumping and conveying water throughout California. With the shortages of water in the west and a renewed interest in reclaimed water, the draft plan also needs to assess the increased use of energy for reclaimed water. Most facilities that will be used for processing reclaimed water are located at the down stream end of most collection systems. Since these systems operate mainly by gravity flow, any new reclamation facilities will require significant energy resources for their processes and for placement back into the water delivery system.

In conclusion, The Associates support the efforts of the California Air Resources Board in developing a comprehensive plan to address Climate Change and hope our comments will be helpful in your efforts. The electricity sector has an important role in achieving the goals of AB 32 and with appropriate consideration for the unique attributes of each utility, whether public or private, Californians can look to a brighter future.

Sincerely,

Richard Dickinson
President,
Los Angeles Water and Power Associates, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 21:16:09

No Duplicates.

Comment 52 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Helen
Last Name: yang
Email Address: taotaom@gmail.com
Affiliation:

Subject: Livestock a major threat to environment
Comment:

According to a new report published by the United Nations Food and Agriculture Organization, the livestock sector generates more greenhouse gas emissions as measured in CO2 equivalent ¡V 18 percent ¡V than transport. It is also a major source of land and water degradation.

Says Henning Steinfeld, Chief of FAO¡¦s Livestock Information and Policy Branch and senior author of the report: ¡§Livestock are one of the most significant contributors to today¡¦s most serious environmental problems. Urgent action is required to remedy the situation.¡¨

With increased prosperity, people are consuming more meat and dairy products every year. Global meat production is projected to more than double from 229 million tonnes in 1999/2001 to 465 million tonnes in 2050, while milk output is set to climb from 580 to 1043 million tonnes.

Long shadow

The global livestock sector is growing faster than any other agricultural sub-sector. It provides livelihoods to about 1.3 billion people and contributes about 40 percent to global agricultural output. For many poor farmers in developing countries livestock are also a source of renewable energy for draft and an essential source of organic fertilizer for their crops.

But such rapid growth exacts a steep environmental price, according to the FAO report, Livestock¡¦s Long Shadow ¡VEnvironmental Issues and Options. ¡§The environmental costs per unit of livestock production must be cut by one half, just to avoid the level of damage worsening beyond its present level,¡¨ it warns.

When emissions from land use and land use change are included, the livestock sector accounts for 9 percent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 percent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

And it accounts for respectively 37 percent of all human-induced methane (23 times as warming as CO2), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain.

Livestock now use 30 percent of the earth¡¦s entire land surface, mostly permanent pasture but also including 33 percent of the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is a major driver of deforestation, especially in Latin America where, for example, some 70 percent of former forests in the Amazon have been turned over to grazing.

Land and water

At the same time herds cause wide-scale land degradation, with about 20 percent of pastures considered as degraded through overgrazing, compaction and erosion. This figure is even higher in the drylands where inappropriate policies and inadequate livestock management contribute to advancing desertification.

The livestock business is among the most damaging sectors to the earth¡¦s increasingly scarce water resources, contributing among other things to water pollution, euthropication and the degeneration of coral reefs. The major polluting agents are animal wastes, antibiotics and hormones, chemicals from tanneries, fertilizers and the pesticides used to spray feed crops. Widespread overgrazing disturbs water cycles, reducing replenishment of above and below ground water resources. Significant amounts of water are withdrawn for the production of feed.

Livestock are estimated to be the main inland source of phosphorous and nitrogen contamination of the South China Sea, contributing to biodiversity loss in marine ecosystems.

Meat and dairy animals now account for about 20 percent of all terrestrial animal biomass. Livestock¡¦s presence in vast tracts of land and its demand for feed crops also contribute to biodiversity loss; 15 out of 24 important ecosystem services are assessed as in decline, with livestock identified as a culprit.

Source:fao.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 22:04:10

No Duplicates.

Comment 53 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Morgan
Last Name: Putnam
Email Address: putnam@caltech.edu
Affiliation:

Subject: Reducing Financial Risk: The Advantage of a Carbon Tax
Comment:

To whom it may concern,

I understand that there are both pros and cons to carbon tax and carbon cap and trade plans. However, based upon my undergraduate education in chemical engineering and my graduate education in photovoltaics (solar cells), I strongly suspect that a carbon tax would provide a much more stable pathway to AB 32's goal of a 20% reduction in carbon dioxide emissions from 1990 levels by 2020.

One of the largest challenges that I see facing the renewable energy industries is the size and time scale of the financial investments needed. To clarify this point, I would like to briefly discuss the Ôsilicon shortageÕ that has been present in the solar industry since 2004. The Ôsilicon shortageÕ is not a result of a shortage of cheap silicon in the earthÕs crust, but rather the shortage exists because plants that purify silicon are not being built fast enough to meet the increased demand for purified silicon. While it might seem odd that companies would be hesitant to provide raw materials for an industry that has grown over 40 % each of the past five years, one must keep in mind that a plant to purify silicon is an investment on the order of $100 million dollars. Additionally, it takes three years to build a plant. This is a typical cost and time-scale for a large-scale chemical purification plant; confer plant costs and time scales in the oil and gas industry. Consequently, for companies to risk $100 million in a silicon purification plant, they need to know that they will be able to sell their purified silicon, not this year or next year, but three years from now and every year thereafter for ten to fifteen years. Undoubtedly then, there is a substantial amount of risk in such an investment. I believe this is the reason why a Ôsilicon shortageÕ continues to exist in the solar industry.

Thus a key challenge for a carbon mitigation system is the reduction of financial risk for large capital investments. Reducing this risk requires creating a system where the cost of emitting carbon dioxide five, ten and fifteen years from now is predictable with some level of accuracy. Intuitively, it seems to me that a carbon tax will be able to meet this challenge with greater success than a carbon cap and trade system, and it is for this reason that I urge you to consider how well the system that you choose will be able to meet this important challenge.

Lastly, I would like thank you for your time and for granting the public the opportunity to offer input,

Sincerely,

Morgan Putnam

Morgan Putnam
Ph.D. Candidate
Chemical Engineering
California Institute of Technology

B.S. Chemical Engineering, Cornell University 2005

Attachment: www.arb.ca.gov/lists/sp-design-ws/56-carb.doc

Original File Name: CARB.doc

Date and Time Comment Was Submitted: 2008-08-01 00:15:11

No Duplicates.

Comment 54 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Lucy
Last Name: Li
Email Address: lightlig4@yahoo.com
Affiliation:

Subject: Change diet to vegetarian for reducing greenhouse gas
Comment:

We should stop to raising animals, stop to kill them, and stop to eat their meats for our health and save the planet.

According Food and agriculture Organization of United Nation, livestock is a major threat to environment. Livestock generates 65 percent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure. And it accounts for respectively 37 percent of all human-induced methane (23 times as warming as CO2), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain. Livestock use 30 percent of the earth's entire land surface, mostly permanent pasture but also including 33 percent of the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is a major driver of deforestation, especially in Latin America where, for example, some 70 percent of former forests in the Amazon have been turned over to grazing. For more information, please refer to these websites:
http://www.ecofoodprint.org/climate.html
http://www.fao.org/newsroom/en/news/2006/1000448/index.html

Eating meats cause a lot of diseases, such as cancer, heart disease, mad cow disease, bird flu, etc., while vegetarian diet is safe, health, and economic. Vegetarian kids have higher IQs than their classmates; vegetarians live, on average, six to ten years longer than meat-eaters; fifty percent less likely to develop heart disease and cancer. For more information, please refer to the below websites:
http://al.godsdirectcontact.org/your_food
http://www.vegsource.com
http://www.vrg.org
http://www.vegsoc.org

Thanks for your hard work!

Sincerely

Lucy Li

Attachment: www.arb.ca.gov/lists/sp-design-ws/57-arb-080108.doc

Original File Name: ARB-080108.doc

Date and Time Comment Was Submitted: 2008-08-01 00:45:23

No Duplicates.

Comment 55 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Karen
Last Name: McDonough
Email Address: karen.mcdonough@sanjoseca.gov
Affiliation:

Subject: City of San Jose Comment
Comment:

```
Funding for climate change programs are very limited due to severe
budget shortages. One potential option is to investigate the
opportunity to support an amendment adding climate change
activities as a Prop 218 user fee exemption similar to other vital
services to the communities such as waste water and water services.
 This would help cities obtain long-term funding for essential
services that affect our entire community.

Ensure that past efforts by cities and current reporting protocols
can be reconciled so that earlier reduction efforts are not lost.
There is a concern that data prior to 2005 may use different
metrics that need conversion.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 01:13:24

No Duplicates.

Comment 56 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Allan
Last Name: Zabvel
Email Address: williams.zabel@sbcglobal.net
Affiliation:

Subject: Carbon Fees not cap-and-trade; also Request for Extension
Comment:

My wife, Laurie Williams and I have written 2 pieces regarding this issue. Please consider our explanations of why carbon fees are the more efficient and effective market mechanism in the 2 pieces below (1)our website at www.carbonfees.org, and (2) our July 11th editorial, imported below. In summary, we believe that cap-and-trade is a flawed strategy for addressing climate change.

The Acid Rain experience does not prove that cap-and-trade is applicable to climate change. The two situations are completely distinguishable. With climate change we face the need for massive new infrastructure and innovation (as opposed to Acid Rain, where an easy fuel switch was available); we also have a lack the comprehensive accurate monitoring of greenhouse gases that was available for the contaminants of concern in Acid Rain. Finally Acid Rain did not allow outside offsets. All of this makes the applicability of the Acid Rain experience to climate change a myth.

Also attached as a PDF please find a visual explanation of how carbon fees work, and a request for additional public education and an extension of the comment period on this issue.

1. Please see our May 4th, 2008 Open Letter to Congress at www.carbonfees.org. While this is not aimed at California and the AB 32 process, the same arguments apply. This website also provides additional information on our credentials as public sector environmental enforcement attorneys and references for the arguments that we make.

2. Please also consider the arguments in the following piece: Cap & Trade - Misplaced Confidence (published in California Energy Circuit on July 11, 2008) which addresses AB 32 and the upcoming decision by the California Air Resources Board.

By Laurie Williams & Allan Zabel

As poles and glaciers melt, permafrost thaws and oceans acidify from our ever-increasing greenhouse gas emissions, the question of whether a carbon cap-and-trade program or carbon fees would provide swifter, more equitable and certain emissions reductions is increasingly urgent. Based on our experience as environmental enforcers (including Allan's experience with cap-and-trade programs), we believe that the California Air Resource Board's confidence in cap-and-trade is misplaced and that carbon fees provide the more effective and efficient path to the goals of AB

32, California's landmark climate protection law.

As long expected, California's recently released AB 32 Draft Scoping Plan relies heavily on "cap-and-trade" to reduce the state's significant contributions to global greenhouse gas emissions. The draft minimizes the value of a system of "carbon fees." The Air Resources Board justifies its preference by calling cap-and-trade a more certain route to meeting AB 32's requirement to reduce California's emissions 30 percent below "business as usual" by 2020.

However, cap-and-trade has serious downsides.

Unless all cap-and-trade elements, including offsets, are limited to systems with accurate emissions measurement, the cap on total emissions will likely be inflated and claimed reductions exaggerated. While the emissions of large electrical generating facilities with continuous emission monitoring systems can be accurately tracked, many other sources of emissions and offsets cannot be as closely monitored.

If these less-accurately-measured sources participate, the integrity of the cap-and-trade program will be undermined, as will the certainty in reductions that CARB seeks. In addition, even if the market is limited to facilities with continuous emission monitors, this will create artificial scarcity that is likely to result in disruptions and unfairness, as initial and future allocations of the right to emit are distributed and traded.

A preview of such disruptions was provided by the manipulations that created the California energy crisis early in this decade. This potential was also demonstrated in a recent simulation at the University of California at Berkeley's Haas School of Business, in which students gamed a carbon-trading market for individual gain, leading to scarcity and high prices. This potential for market manipulation could contribute to undesirable price volatility. The resulting lack of price predictability in a cap-and-trade system (specifically, the lack of certainty that the price of energy from fossil fuels will exceed the price of green energy) reduces the incentive for the substantial investments in the new infrastructure and innovation necessary to provide alternative energy at affordable prices.

The history of cap-and-trade demonstrates the limitations of the state's proposal.

The so-called "cap-and-trade" of the federal acid rain program in no way resembles the complex challenge we face in reducing greenhouse gases. Under the program, all facilities had monitors, so the system had the integrity of accurate measurement. There was relatively little trading, particularly outside of any given corporation and its subsidiaries. Trading in the acid rain program primarily meant that some corporations complied with the gradual reductions in total sulfur emissions by averaging among several of their facilities. In addition, there was no significant need for investments in new technologies or innovation in order to reduce sulfur. All that was needed--and what happened--was a "fuel switch" from high-sulfur coal, to the low-sulfur coal found in Wyoming's Powder River Basin.

In contrast, another cap-and-trade program failed spectacularly in Los Angeles. Known as RECLAIM (the Regional Clean Air Incentives

Market), it was aimed at reducing ground level ozone. In RECLAIM, despite the presence of monitors, an inflated cap delayed most emission reductions for over seven years. At the end of that time, the market collapsed and the necessary control technology was required by regulation.

Similarly, attempts to design an effective carbon cap-and-trade system have failed under the Kyoto Protocol--a 1997 international accord to cut greenhouse gas emissions which the U.S. never ratified. Utilities and other sources have underreported their emissions, purchased flawed offsets, driven up prices, reaped billions in undeserved profits and generally failed to produce promised emission reductions.

Despite cap-and-trade's enormous disadvantages, it is ardently supported by two disparate groups. This first consists of those who stand to profit, whether from trading, certifying offsets and/or delaying the phase-out of fossil fuels. The second includes those who truly want rapid reductions, but believe that the greater efficiency and transparency of carbon fees is politically unattainable and/or fail to understand that the vulnerabilities of cap-and-trade to manipulation and fraud will make the "cap" illusory.

The advantages of carbon fees, in contrast, include simplicity and transparency. For instance, the U.S. Congressional Budget Office stated in its February 2008 report: "A tax on emissions would be the most efficient incentive-based option for reducing emissions and could be relatively easy to implement." These advantages include that it is much easier to effectively trace and impose a fee on all fossil fuels at the point of importation or extraction than it is to accurately measure all greenhouse gas emissions.

By phasing in gradually increasing carbon fees that would go up each year until the price of energy made from fossil fuels exceeds the price of clean technologies, carbon fees would create the certainty needed to spur investment in post-fossil fuel energy sources. A per-capita rebate of these carbon fees to all California taxpayers would cushion the impact of higher energy prices, particularly for low and middle income taxpayers, during the transition to the post-fossil fuel economy. The relative certainty provided by escalating carbon fees and the investments they would foster are likely to catapult California and the nation into a leadership position in green technology and set a roadmap for the rest of the world on how to move beyond the ineffective policy of cap-and-trade.

As CBO acknowledges, the main barrier to the carbon fees approach is a lack of political acceptability. It in turn is based on a lack of public education about why carbon fees (and a ban on new coal-fired power plants without sequestration) are our best hope to save our way of life and leave a habitable biosphere to the next generation.

By selecting carbon fees to meet AB 32's goal, California could lead the nation in effectively and efficiently addressing climate change. While CARB's draft scoping plan attempts to support its preference for cap-and-trade by indicating that it would fit well with expected cap-and-trade programs by the Western Climate Initiative and the federal government, this justification is unworthy of California's proud tradition of environmental leadership.

Only if we discuss the urgency of the problem and the most effective solution with friends, families, neighbors and colleagues, and ask them to join us in calling and writing our representatives, can we jump-start the huge outpouring of public participation necessary to make carbon fees the acceptable as well as the wise choice.

--Laurie Williams and Allan Zabel of www.carbonfees.org wrote this editorial as citizens and parents. In May, the two lawyers issued an open letter to Congress urging lawmakers to put their efforts into setting carbon fees in place of a carbon cap-and-trade program. For details about their professional experience and carbon fees approach, see their website.

3. Attached please find a visual providing a chart to demonstrates how the certainty that green energy will become less expensive than fossil fuel energy would affect investment and affordability. Cap-and-trade cannot deliver this same price certainty and hence will not be as effective in moving us to a post-fossil fuel economy.

4. REQUEST FOR EXTENSION:
We believe that an additional period of public education should occur on the issue of carbon fees vs. cap-and-trade, and that there should be an additional comment period on this issue prior to a final decision.

Attachment: www.arb.ca.gov/lists/sp-design-ws/59-45-why_carbon_fees_work_7-28-08.pdf

Original File Name: 45-why_carbon_fees_work_7-28-08.pdf

Date and Time Comment Was Submitted: 2008-08-01 10:38:49

No Duplicates.

Comment 57 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Garrett
Last Name: Fitzgerald
Email Address: gfitzgerald@oaklandnet.com
Affiliation: City of Oakland

Subject: Comments on Program Design
Comment:

Below are comments from the City of Oakland specific to Proram Design related to the Draft Scoping Plan. These comments were also included in the City of Oakland's letter submitted to the General Comments section of this website.

1. Economic Analysis on Low-Income Communities Needed
The Plan references an economic analysis being conducted of potential impacts on low-income communities due for release in Summer 2008. The City of Oakland are very interested in this analysis and the potential impacts of the Plan on low-income residents of our community. In particular, we are interested in evaluations of the potential cost impacts that may be passed to residents/consumers through electricity and fuel surcharges, along with any programmatic fees that might be levied through other avenues. We have significant concerns that low-income residents may be disproportionately affected by these costs due to relatively low ability to pay, and urge that specific actions be taken to help offset these disproportionate effects.

2. Revenues Should be Invested via Local Governments to Cost-Effectively Reduce Additional GHGs, Increase Resilience to Climate Change, and Green California’s Economy
Page 45
We strongly support the suggestion that a portion of program revenues should be invested in the form of “funding or other incentives to local governments for well-designed land-use planning and infrastructure projects [that] can do much to discourage long commutes and encourage walking, bicycling and use of transit.” Local governments, working independently and in collaboration with regional partners, have significant leverage in fostering vehicle trip reductions, a critical component to reducing transportation-related GHG emissions. Reducing vehicle miles traveled throughout the state will be critical not only to achieving the AB 32 goals but also the Governor’s stated goals of reducing GHG emissions by 80% by 2050.

In addition, a portion of revenues should be targeted toward making specific transit and other infrastructure improvements in low-income communities, and potentially toward augmenting traditional low-income weatherization and bill assistance-style programs to help offset the disproportionate effects of program-related costs on low-income communities.

A portion of revenues should also be invested in helping local governments to develop climate adaptation/resilience plans to help

local communities best increase resilience to the ongoing, developing effects of climate change that are already happening.

Finally, a portion of funds should be invested in workforce training to prepare workers for green jobs. These funds should be concentrated in areas where a significant number of workers can be engaged.

3. Do Not Rely Exclusively on Cap and Trade
A system that relies exclusively on Cap and Trade could postpone investment in next generation technology. Coupling Cap and Trade with fees levied upon polluters to insist on minimum performance will allow more regulatory oversight and establish a floor price for carbon in the state. Results can be more comprehensive across technologies and challenges as regulators require progress on specific technologies to develop lower polluting alternatives on a specific time schedule. ARB should also consider imposing disincentives on ‘leakage’ (see Section 2B.1) to areas outside the WCI territory.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 10:41:38

No Duplicates.

Comment 58 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Mike
Last Name: Zucksworth
Email Address: lamike05@yahoo.com
Affiliation: Sierra Club

Subject: Supplemental Comment - Cap-and-Trade v Carbon Fees
Comment:

Dear CARB, I wanted to supplement my request for reconsideration of using Carbon Fees, with the following request.

To date CARB has performed very limited public education on Carbon Fees as an alternative market mechanism to create the incentives necessary to transition to a post-fossil fuel economy. I request that CARB consider creating a committee to plan and conduct fair and balanced public education on the choice between Cap-and-Trade and CarbonFees.

Following a period of public education on this choice, I request that you conduct a period of additional public comment on this choice. This is too important a question to go forward without meaningful public education and involvement. I believe that this period of additional public education, involvement and public comment can proceed during the next year, while other AB 32 early actions are undertaken, and thus will not lead to a delay in the emissions reductions mandated by AB 32. As you may be aware studies by both the Congressional Budget Office and the Congressional Research Service have found that Carbon fees (also referred to as Carbon Taxes) would be an effective market mechanism. These studies have also noted significant problems with the Cap-and-Trade approach.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 11:00:09

No Duplicates.

Comment 59 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Loulena
Last Name: Miles
Email Address: lmiles@adamsbroadwell.com
Affiliation: State Building and Construction Trades

Subject: Comment on Draft Scoping Plan Design
Comment:

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As we carve out the path for implementing AB 32, we have an
incredible chance to do more than just reduce GHG emissions.  This
is a golden opportunity to reduce pollution, revitalize the
economy, and create jobs that can support the hard working
families of California.  However, we must be careful to steer
clear of complicated and counterproductive schemes to reduce
greenhouse gases.  If we do not implement AB 32 so that it
produces substantial, visible economic benefits for middle class
workers, we will not ultimately succeed in creating a model that
produces world-wide reductions in greenhouse gas emissions.

Please see attached file for our full comments.
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Attachment: www.arb.ca.gov/lists/sp-design-ws/62-2207-002a_final_building_trades_comments_on_draft_scoping_plan__3_.pdf

Original File Name: 2207-002a FINAL Building Trades Comments on Draft Scoping Plan (3).pdf

Date and Time Comment Was Submitted: 2008-08-01 12:14:22

No Duplicates.

Comment 60 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Arthur
Last Name: O'Donnell
Email Address: arthur@resource-solutions.org
Affiliation: Center For Resource Solutions

Subject: Comments on Climate Change Draft Scoping Plan
Comment:

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Please find attached comments on the Climate Change Draft Scoping
Plan prepared by the Center For Resource Solutions.

Sincerely,

Arthur O'Donnell
Executive Director
Center For Resourc Solutions
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Attachment: www.arb.ca.gov/lists/sp-design-ws/63-crs_arb_scoping_plan_comments.pdf

Original File Name: CRS ARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 12:22:46

No Duplicates.

Comment 61 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Zheng
Last Name: Liang
Email Address: lawrence.liang@verizon.net
Affiliation: 909-931-1267

Subject: Subject: Live Stock is a major reason of global warming
Comment:

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First Name: Zheng
Last Name: Liang
Email Address: lawrence Liang
Affiliation:

Subject: Livestock is a marjor reason of global warming

Comment:

It is great to know that you as a govenment officials take the
iniate to act on this issue of global warming, I was encouraged
by
you and appreciated your great effort. That's the government that
we people need.

After went through your plan, I have found out a big loop hole in
the whole act, that is you missed the big picture of the whole
issue: the main reason to cause the global warming. If you check
all the publication from Nasa Website, Many sicientist have
already prooved that the most contribution of the global warming
is from live stock industry, meat eating of us is the real reason
behind it. Only if we know about the truth, then we can find the
right way to solve the problems. Vegetarianism is the best way to
stop the global warming.

According to Senior UN Food and Agriculture
Organization (FAO) official Henning Steinfeld,  livestock are one
of the most significant contributors to today's most serious
environmental problems and urgent action is required to
remedy the situation.? The reasons include:

1. The livestock sector generates more greenhouse gas emissions
as measured in CO2 equivalent to 18 percent than transport. It is
also a major source of land and water degradation.

2.Livestock generates 65 percent of human-related nitrous oxide,
which has 296 times the Global Warming Potential (GWP) of CO2.
Most of this comes from manure. And it accounts for respectively
37 percent of all human-induced methane (23 times as warming as
CO2), which is largely produced by the digestive system of
ruminants, and 64 percent of ammonia, which contributes
significantly to acid rain.

3. livestock now use 30 percent of the earth entire land
surface, mostly permanent pasture but also including 33 percent
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of
the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is
a major driver of deforestation, especially in Latin America where,for example, some 70 percent of former forests in the Amazon
have been turned over to grazing.

4. The livestock business is among the most damaging sectors to the earth increasingly scarce water resources, contributing among other things to water pollution, euthropication and the degeneration of coral reefs. The major polluting agents are animal
wastes, antibiotics and hormones, chemicals from tanneries,fertilizers and the pesticides used to spray feed crops.Widespread overgrazing disturbs water cycles, reducing replenishment of above and below ground water resources. Significant amounts of water are withdrawn for the production of feed.

For more detail information about livestock, please click the below link: www.fao.org/newsroom/en/news/2006/1000448.

Livestock sector is a major greenhouse gas source. Please do not ignore it. Only vegetarianism can solve the Crysis. Otherwise, by 2012, the world is going to the point of no return. Human specise is going to vanish from the earth including all other living beings. So please add this most important part into your sector or
as a general background of this act.

Thanks for your understanding and acceptance of our suggestions

Zheng Liang

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 12:32:33

No Duplicates.

Comment 62 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Taylor
Last Name: Miller
Email Address: tmiller@sempra.com
Affiliation: Sempra Energy

Subject: Sempra Energy comments on Draft Scoping Plan
Comment:

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Please see attached letter and detailed comments.
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Attachment: www.arb.ca.gov/lists/sp-design-ws/65-se_draft_scoping_plan_comments_lrtm__2_.pdf

Original File Name: SE Draft Scoping Plan Comments LRTM (2).pdf

Date and Time Comment Was Submitted: 2008-08-01 12:48:03

No Duplicates.

Comment 63 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Erin
Last Name: Rogers
Email Address: erogers@ucsusa.org
Affiliation: Union of Concerned Scientists

Subject: comments from Prof. David Roland-Holst on offsets
Comment:

Think Globally, Innovate Locally:
Offsets and the Risks of Outsourcing Climate Action
David Roland-Holst†
UC Berkeley
July 2008

† Department of Agricultural and Resource Economics, University of California, Berkeley. This policy brief was written at the request of the Union of Concerned Scientists. Opinions expressed here are those of the author and should not be attributed to affiliated institutions. Contact: dwrh@berkeley.edu

As the world awakens to the reality of climate change, policy makers are scrambling to reconcile the need to reduce global warming pollution with traditional economic priorities such as growth, employment, and technological progress. Fortunately, a growing body of research suggests a way forward, though the challenges are enormous: transitioning to a low-carbon future without having to sacrifice living standards will require path-breaking commitments to innovation. The opportunities this presents are just as significant as the challenges, and the rewards may rival those of history's most robust industrial and technological booms.

Rising global warming pollution has drawn California, the world's eighth largest economy, into an unprecedented policy dialogue that will influence energy and environmental decisions around the world. Among many other climate action initiatives, pollution offsets are being intensively discussed—particularly in the context of market-based incentive schemes like carbon trading—yet their full implications for the state are only partially understood. Some industry stakeholders strenuously advocate offsets because they can reduce short-term adjustment costs. To achieve a balanced appraisal of this approach, outsourcing climate action, more evidence is needed. At this critical moment of policy debate, we all need to better understand the benefits and costs of offsets.

My research on the economic effects of AB 32 suggests that California will achieve higher growth and more widespread employment benefits if climate policies induce innovation, building on the state's long history of improvements in energy efficiency. Thanks to a generation of stringent regulatory standards, California's per-capita electricity consumption is 40 percent below the national average. The resulting energy savings have exceeded the capacity of 24 traditional coal-fired power

plants and represented $56 billion dollars of household income. The power plants were never built, and the household savings went on to create about 1.3 million new jobs and $40 billion in new payrolls. Offsets, by contrast, would outsource both efficiency gains and their many downstream benefits. California has the innovation capacity to capture these benefits for its own economy.

Short Term Challenges, Long Term Opportunities

Because the dispersion of global warming pollutants is a worldwide phenomenon, there is in principle no reason not to “recognize”—that is, account for—mitigation wherever it occurs. Indeed, many advocates of offsets argue that mitigation can be achieved at lower cost outside the geographic boundaries of the trading scheme (e.g., outside California) and that climate risk can thus be reduced more efficiently with offsets. For example, a U.S. company might invest in, sell, or give a more efficient power plant to a Chinese counterpart in exchange for some contractual arrangement specifying that the transaction results in lower global warming pollution than would otherwise have been emitted. These contracted reductions would then be credited to the U.S. investor. Although there are extra transactions expenses, such a deal could reduce global warming pollution at lower cost than that of inventing and adopting entirely new technology at home.

Countering this simple intuition are many uncertainties—including the challenges of measurement, verification, and “additionality” (defined below)—as well as environmental and economic objections. From an environmental perspective, offsets forsake the opportunity to reduce local pollution, which often is toxic and represents substantive local public health risk and environmental damage. The costs of such effects and, just as important, the benefits of local mitigation, are not usually considered in the global efficiency argument. They need to be estimated and included, however, if local stakeholders are to fairly compare offsets with in-state global warming pollution reductions.

Offsets also forsake the opportunity for innovation, and for higher-income technology-intensive economies like California this may be their most serious drawback. The primary drivers of the state’s superior growth experience over recent decades have been education and innovation, which together have made the state a knowledge-intensive leader in the global economy. First in information and communication technology (ICT), then in biotech, California’s R&D supply chain has delivered solutions for the most dynamic and profitable sectors of modern times. And now the Next Big Thing has arrived, as is apparent from the venture community’s rapid initiatives to capture the opportunities it presents.

New Markets Will Belong to Innovators

That Next Big Thing is efficient and clean energy use; today’s innovators in this field will be tomorrow’s new technology barons. Because energy consumption accounts for over 80 percent of CO_2 emissions, energy efficiency is a cornerstone of climate action. By revenue, energy is also the world’s largest industry. Because this product so pervades the modern economy, efficiency can do for energy what ICT did for management and logistics—deliver innovation that revolutionizes traditional practices around the world. Such innovation will save money in the production of every single modern good and service; and in an era of escalating energy prices, demand for efficiency would grow robustly over the coming decades even without climate action. These considerations,

together with the additional demand induced by local environmental regulation, will create an enormous global market in new energy-use technologies that range from compact fluorescent light bulbs to hybrid vehicles.
These markets will be dominated by innovators, not those who defer innovation. While it is a laudable goal to reduce pollution in poor countries, doing so with today's technology merely substitutes short-term solutions elsewhere for long-term solutions and opportunities both at home and in rapidly emerging global technology markets. For example, even though the U.S. electric power systems are more efficient than those of many other countries, they remain far less efficient than they needs to be in order to meet our long-term needs for decarbonization.

Meanwhile, the so-called "additionality" problem is a serious conundrum for offset advocates. Simply put, how do we know that an investment we make in lower pollution elsewhere would not have been made anyway—especially in dynamic emerging markets, where spontaneous rates of innovation and technology adoption are very high? Such an investment would not only be a false economy but also would imply significant opportunity costs. China, for example, is facing some the world's fastest-growing energy prices, as domestic fuel subsidies have become unsustainable and the country has moved, in a single decade, from being a small net exporter of oil to the world's second-largest importer. These price pressures will do much more to stimulate long-term energy efficiency than a short-term opportunity to export pollution rights. Consider that China, which was once the ultimate labor-intensive economy, is today the fastest-growing market for industrial robotics. Why? Even the most expensive technologies become profitable in the face of rising wages and the desire for higher product quality. In much the same way, rising energy prices and a rapidly increasing public desire for environmental quality will drive emerging markets toward pollution mitigation.

Other challenges related to offsets arise from unwelcome secondary effects that are socioeconomic in nature. For example, if we pay for environmental mitigation in fast-growing economies, what incentive do they have to establish and maintain their own standards? What happens when offsets arouse conflict between home and overseas regulatory regimes or complicate salient social issues (such as labor standards, biofuel-food tradeoffs, or biodiversity)? Clearly, offsets can lead to a host of new and difficult policy challenges.
Offsets can also dispel the momentum of climate action into profit making by middlemen marketing uncertain projects and financial instruments. By putting a price on carbon, mechanisms like cap and trade share the burden of adjustment, using markets to identify real efficiency and reward innovation. Creating a market for surrogate pollution reduction invites intermediaries to package emerging market technology adoption and sell it to more affluent bidders. Like the current mortgage securitization mess, contracting for far-away emission cuts creates uncertain agency relationships that increase transactions costs and risk. These schemes create real profit for matchmakers, but information and incentive problems multiply as the principals become farther and farther removed from each another. Verifiability, enforceability, and sustainability of such contracts all become more tenuous across space and time, and the short-term cost advantage and efficacy of offsets decline accordingly.

Finally, we need to recognize that offsets forsake opportunities

to reduce long-term energy costs by leaving us vulnerable to ever-rising energy prices. Rapidly emerging economies might be happy to accept our technology while we defer innovation, but they will not pay our energy bills. As the costs of electricity, gasoline, and all the goods that use them continue to escalate, we pay more for every day we drag our feet on improving energy efficiency at home.

Outsourcing climate action through offsets ultimately outsources innovation and its rewards. Energy technology should take its rightful place among California's knowledge-intensive industries, establishing new global standards at home for climate security and sustained prosperity. California should say no to offsets and accept the challenge to innovate.

Attachment: www.arb.ca.gov/lists/sp-design-ws/66-drh_offsets_policy_brief.pdf

Original File Name: DRH_offsets_policy_brief.pdf

Date and Time Comment Was Submitted: 2008-08-01 13:08:04

No Duplicates.

Comment 64 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Rob
Last Name: Neenan
Email Address: rob@clfp.com
Affiliation: CA League of Food Processors

Subject: CLFP Scoping Plan Comments
Comment:

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The enclosed document summarizes the views of the California League
of Food Processors regarding ARB's Draft Scoping Plan.
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Attachment: www.arb.ca.gov/lists/sp-design-ws/67-clfp_comments_re_june_2008_draft_scoping_plan.doc

Original File Name: CLFP COMMENTS RE JUNE 2008 DRAFT SCOPING PLAN.doc

Date and Time Comment Was Submitted: 2008-08-01 13:25:13

No Duplicates.

Comment 65 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Raymond
Last Name: Baltar
Email Address: rbaltar@sonic.net
Affiliation: Sierra Club/Solar Sonoma County

Subject: Scoping Plan
Comment:

Dear CARB,

Thank you VERY MUCH for your work on the Draft AB32 Scoping Plan to reduce California's GHGs by 2020. This is critical work, especially setting goals for the State to increase renewable energy and reduce vehicle miles traveled.

Please consider these recommendations on behalf of myself, Raymond Baltar (all California residents) for inclusion in the Final Scoping Plan:
- The State should auction 100% of permits under the cap. Polluters should pay for their emissions, not be given free permits that subsidize coal and prolong the transition to cleaner energy. Future generations must be protected!
- The Scoping Plan should specify that some auction revenues will be used to provide a Dividend to compensate consumers. With food, gasoline, natural gas, and electricity prices all increasing, helping consumers deal with food, fuel and electricity costs is a good use of auction revenues.
- We strongly support CARB's proposal for Carbon Fees on fossil fuel companies to help fund CARB's implementation of AB32.

Carbon Fees should also provide funding sources for clean technologies, green jobs, energy efficiency programs, and more.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 13:31:14

No Duplicates.

Comment 66 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Joshua
Last Name: Stark
Email Address: JStark@npca.org
Affiliation: National Parks Conservation Association

Subject: Comments to the carbon market references in the Draft Scoping Plan
Comment:

The National Parks Conservation Association (NPCA) is America's only private, non-profit advocacy organization dedicated solely to protecting, preserving and enhancing the National Park System. NPCA was founded in 1919 and has more than 350,000 members and supporters, including 45,000 members in California.

NPCA applauds the California Air Resources Board and the State of California in its vital implementation of greenhouse gas reductions. As in many cases, the actions of this great state formulate policy for the rest of the nation, and hopefully, the world, and so it is vital that the implementation of AB 32 first be effective in reducing greenhouse gas emissions. In this spirit, the National Parks Conservation Association offers the following recommendations with regards to the proposed cap-and-trade market mechanism.

The component of the proposed scoping plan relying on a regionally organized cap-and-trade market program and expected to create the largest reductions is also by far the most controversial component. Should CARB adopt this plan, NPCA believes that any carbon market, in order to successfully combat climate change, must include the following:

1. Offsets must be auctioned:

Allowances, offsets, credits – whatever their name, must not be given away. Initial GHG offsets must be bought in an auction, with the proceeds to go directly to combating the effects of climate change on disproportionately affected areas, including habitat and resource protections and disadvantaged communities.

As we have seen, our natural resources are bearing the brunt of climate change. With most reputable models showing California becoming hotter and drier, the potential for catastrophic fires and major changes to the many ecological niches in California are quickly becoming reality. In California’s national parks, major glaciers are disappearing, and iconic species like giant sequoias and Joshua trees are experiencing greater threats. It is vital that our species and watersheds be protected, and revenues from an appropriate offset auction can help to mitigate the effects we have had on our climate.

In addition, disadvantaged communities within California should benefit from any funds created through an appropriate and effective offset auction. As our state becomes hotter and drier,

poorer and rural communities, including gateway communities to many of our national parks, also experience disproportionate impacts. Lower income and rural communities often have older energy grids and fewer ways to keep warm, and with the growing outcry for water metering, will find it harder to acquire clean water sources. To help mitigate the effects of power outages during heat waves and less clean water, proceeds from an effective offset auction should, in part, be allocated to disadvantaged communities.

2. Specific greenhouse gas reductions must occur in California, while maintaining consistency with the mission of the Air Resources Board:

AB 32 is a state regulation requiring the reduction of California's emissions to 1990 levels by 2020. This law should not be superceded by a regional market agreement. In order to adequately adhere to AB 32 requirements, and in order to reap its greatest benefits, any participation by California in a cap-and-trade market must result in specific reductions in GHG emissions within the state. Should CARB adopt a model which does not guarantee in-state reductions to meet AB 32 requirements, there exists the unfortunate possibility of tying up any implementation in unnecessary court battles, due to noncompliance. Instead, California's participation in any regional market should take place parallel to AB 32 requirements.

One possible way to ensure actual carbon reductions within the state may be for CARB to develop accurate measurements for institutions participating in a market scheme, and to develop incentives for reducing emissions through a market, while not relying directly on the market model as the source for reductions in GHG emissions.

It is also vital that any cap-and-trade scheme maintain consistency with the mission of the California Air Resources Board. Co-benefits to greenhouse gas reductions are not merely an important positive externality to an effective cap-and-trade scheme; they are also central to the mission of the Air Resources Board. By ensuring specific reductions to emissions within the state, California will reap the benefits of curbing carbon by also curbing health-damaging pollutants.

There exists in carbon market schemes the potential for offsets and credits to actually increase pollution within the state. Ensuring the appropriate and true footprint of proposed developments can go a long way toward eliminating this possibility.

Overall, NPCA is concerned that the Air Resources Board has put so much emphasis on reducing California's greenhouse gas emissions in a market scheme that has not yet been created. This market is still a set of ideas in its infancy, with many potential new players yet to join, and with so much still unfinished. California has only 12 years to reach its legal requirement, a requirement lacking in other states, provinces, and territories. It is possible for California to attach its goals to a larger group, only to see those goals thrown out by ensuing deals. If this were to occur, California would still need to meet its legal mandate. NPCA encourages the Air Resources Board to develop additional measures to meet AB 32 requirements with the understanding that any deals made regionally, nationally, or

internationally may not meet the legal requirements of AB 32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 13:32:26

No Duplicates.

Comment 67 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Pamela
Last Name: Lacey
Email Address: placey@aga.org
Affiliation: American Gas Association

Subject: AGA Comments on Draft Scoping Plan - Program Design
Comment:

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The American Gas Association respectully submits the attached
comments on the California Air Resources Board's Draft Scoping
Plan.  We urge the Board to adopt the recommendation of the
California Public Utility Commission to cover natural gas
residential and commercial customers through enhanced energy
efficiency programs and other measures, rather than placing them
under a cap at this time.
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Attachment: www.arb.ca.gov/lists/sp-design-ws/70-aga_com_arb_scoping_aug1__2008.pdf

Original File Name: AGA Com ARB Scoping Aug1_ 2008.pdf

Date and Time Comment Was Submitted: 2008-08-01 14:56:18

No Duplicates.

Comment 68 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Tracey
Last Name: Drabant
Email Address: traceydrabant@bves.com
Affiliation: Bear Valley Electric Service

Subject: Request that AB 32 Scoping Plan Incorporate Cross-Sector Options for GHG Reduction Measure
Comment:

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See attached
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Attachment: www.arb.ca.gov/lists/sp-design-ws/71-request_that_ab_32_scoping_plan_incorporate_cross-sector_options.pdf

Original File Name: Request that AB 32 Scoping Plan Incorporate Cross-Sector Options.pdf

Date and Time Comment Was Submitted: 2008-08-01 14:58:15

No Duplicates.

Comment 69 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Bruce
Last Name: McLaughlin
Email Address: mclaughlin@braunlegal.com
Affiliation: California Municipal Utilities Assoc

Subject: AB 32 Draft Scoping Plan Program Design
Comment:

```
Please accept for filing the attached Comments of the California
Municipal Utilities Association on the Draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/72-cmua_comments_on_draft_scoping_plan_080108.pdf

Original File Name: CMUA Comments on Draft Scoping Plan 080108.pdf

Date and Time Comment Was Submitted: 2008-08-01 15:01:43

No Duplicates.

Comment 70 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Michael B.
Last Name: Day
Email Address: mday@goodinmacbride.com
Affiliation: Goodin, MacBride, Squeri, Day & Lamprey

Subject: Comments of The Solar Alliance and The Vote Solar Initiative
Comment:

```
To Whom It May Concern:

Please find attached to this email the Commnets on Climate Change
Draft Scoping Plan submitted today by The Solar Alliance and The
Vote Solar Initiative to the California Air Resources Board.

Should you have any questions, please contact Michael B. Day at
(415) 392-7900.

Regards,

Linda Chaffee
Secretary to Michael B. Day
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/73-comments_to_arb_on_draft_scoping_plan.pdf__x102032_.pdf

Original File Name: comments to arb on draft scoping plan.pdf (x102032).pdf

Date and Time Comment Was Submitted: 2008-08-01 15:23:08

No Duplicates.

Comment 71 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Karen
Last Name: Del Compare
Email Address: kdcyew@excite.com
Affiliation:

Subject: no gifts to polluters please
Comment:

```
-Please eliminate offsets.  A large number of offsets will
significantly weaken California Air Resources Board ability to
decrease greenhouse gas emissions.

-A carbon fee would be better than cap and trade.  Please do not
give away any allowances for "free."  This would amount to a huge
gift to all of the biggest polluters and is not something to
encourage.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 15:23:29

No Duplicates.

Comment 72 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Gabe
Last Name: Petlin
Email Address: gpetlin@3degreesinc.com
Affiliation: Renewable Energy Marketers Association

Subject: Cap-and-trade should enable voluntary renewable demand to reduce GHG under the cap.
Comment:

```
The Renewable Energy Marketers Association submits the attached
comments on AB 32 Cap-and-trade Allowance Allocations to promote
the voluntary renewable energy market in reducing GHG emission
below the cap.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/75-rema_comments_to_carb_080801.pdf

Original File Name: REMA comments to CARB 080801.pdf

Date and Time Comment Was Submitted: 2008-08-01 15:27:45

No Duplicates.

Comment 73 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Keith
Last Name: Adams
Email Address: adamskb@airproducts.com
Affiliation: Air Products and Chemicals

Subject: Comments on Cap and Trade Aspects
Comment:

Air Products agrees market-based mechanisms will drive the most economic efficient solutions to meeting the state's reduction goal. We encourage CARB to consider a process for the allocation of emission allowances that recognizes those industries that have already invested in state-of-the-art efficient processes. As such, a Cap and Trade program can simultaneously advance the objectives of economically efficient greenhouse gas (GHG) reductions and energy/process efficiency.

Air Products also supports a broad flexibility in the use of cross-border (WCI) allowances and offset purchases to further minimize the overall economic impact of achieving the desired GHG reductions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:01:27

No Duplicates.

Comment 74 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Paul
Last Name: Buttner
Email Address: pbuttner@calrice.org
Affiliation:

Subject: Comments on Scoping Plan
Comment:

```
Please find the attached August 1, 2008 California Rice Commission
letter providing comments on the Draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/77-climate_change_scoping_plan.pdf

Original File Name: Climate Change Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 16:03:52

No Duplicates.

Comment 75 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Lori
Last Name: Wilson-Hopkins
Email Address: lwilhop@hotmail.com
Affiliation: Sierra Club

Subject: Hold polluters accountable
Comment:

```
It is essential that polluters be held accountable for their
greenhouse gas emmissions.  One way to ensure this is to make them
pay.  The money could then be used to support clean energy
programs.  Also, offsets must be limited and closely scrutinized.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:43:20

No Duplicates.

Comment 76 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Diana
Last Name: Lee
Email Address: DIL@cpuc.ca.gov
Affiliation: Division of Ratepayer Advocates, CPUC

Subject: DRA Comments on the Draft Scoping Plan
Comment:

```
DRA Comments on the Draft Scoping Plan, attached.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/79-dra_comments_on_carb_draft_scoping_plan_.pdf

Original File Name: DRA_comments_on_CARB_draft_scoping_plan_.pdf

Date and Time Comment Was Submitted: 2008-08-01 16:48:17

No Duplicates.

Comment 77 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Keith
Last Name: Roberts
Email Address: kroberts@cityofsacramento.org
Affiliation:

Subject: AB32 Program Devempment comments
Comment:

AB32 Program Design

1. Many of the attached comments relate to potential methods for funding of processes so that AB32 can meet its goals. Cities that take a leadership role perhaps need little incentive to assist in achieving these ambitious, but necessary, goals. Many cities will see this as another "unfunded State mandate" unless a process is developed that allows cash-strapped cities to assist in meeting the AB32 goals.

In the following comments, some effort was used to develop potential funding methods in which cities would be paid a fee for furthering the efforts to meet the goals of AB32. To get the greatest buy-in as possible from cities statewide, a sustainable funding mechanism is imperative. Local governments can provide tremendous improvements in the near term and greater improvements over the long term!

2. Feebates as used in this document do NOT conform to the original definition as it relates to automobiles, but DOES relate to a general process that is:
• Revenue neutral to the agency implementing the feebate
• Guides developers, agencies and jurisdictions towards meeting a certain goal; in this case meeting goals of AB32 by increasing fees for projects that do not meet criteria and reducing fees (or rebating fees) for projects that do meet criteria.

3. Page 21: Combined Heat and Power (CHP) plants are wonderfully efficient and could be applicable to the City of Sacramento's 240 acre brown field project at the Rail Yards. However, many parties need to come to agreement regarding the operations, maintenance and particularly capital cost of the systems. Consider:
• Providing tax credits for the use of CHP's
• Reviewing the legal and operational structures of other states and countries that have better success in implementing CHP than in California.

4. Page 28, Public Goods Charge on Water: The PGC should be a flat rate that applies equally throughout the State. Alternatively, for residential customers, consider a tiered rate that increases with increased usage. Also, since PGC's would be new to water utilities, consider ramping up over time, starting with the largest water purveyors that have end-use customers.

5. Page 28, Public Goods Charge on Water: Please take into

consideration that water rates within the state are tremendously diverse; some areas being 20 times greater than other areas and that projects that are cost effective in one region of the State are not necessarily cost effective in another region; yet on the whole, California is an arid state. To address this problem:

• without affecting any local jurisdictions water rates to a great extent
• to foster creativity which should save water better than mandatory reduction targets

would suggest that approximately [75%] of the PGC that is collected by a jurisdiction is used by the same jurisdiction to improve water efficiency within its service territory. The remaining [25%] should be deposited into an account that is used to competitively fund water conservation projects anywhere in the state; competitiveness should be based primarily on gallons of water saved per dollar invested; other secondary considerations might include

• Energy intensity of water being saved
• Quality of water being saved.
• Ability to defer or eliminate major Statewide water infrastructure projects
• Other life cycle issues

6. Page 28, Public Goods Charge on Water: Recommend that the proposed PGC would include Federal water because:

• Federal climate legislation is in the works
• Federally subsidized water provided by Bureau of Land Management (and power provided by Western Area Power Administration) undercuts the need to reduce CO2 by artificially making projects that are cost effective everywhere else not cost effective where subsidized water and power are provided.
• PGC on Federal water (and power) should only be applied if the Federal water customer is an end-user. If Federal water is provided to a water purveyor, that purveyor will have a PGC of their own.

7. Page 41: Consider implementing fees based on carbon intensity of products and services being taxed, not based on energy units. See below and comment for page 71.

8. Page 41, Carbon Fees: Our local electric utility, SMUD has an average annual carbon intensity of +/- 600 pounds per MWh (0.272 metric ton/MWh). Based on this AVERAGE annual emissions factor, a $10 per metric ton fee would add a carbon surcharge of $2.72/MWh or $0.00272/kWh

• This is slightly more complicated than charging based on energy units, perhaps simplicity is desired by State?
• Disadvantages: surcharge cost per unit of energy would be different for various providers (e.g. LADWP would have a high charge per kWh and PG&E and SMUD would have lower charges); as carbon intensity for products DROP, fees will have to INCREASE to maintain constant income.
• Advantages: more directly addresses reduction in carbon emissions; sends message that the goal of the fee is carbon reduction, not fee collection.

9. Page 41, Carbon Fees: By using MARGINAL emissions factors instead of AVERAGE emissions factors to set fees (or a weighting of each), a stronger message could be sent to energy providers to retire, or divest dirtier sources of energy.

• This is more complicated than using AVERAGE emissions factors, would be applicable primarily to electric utilities and perhaps

oil refineries as they develop low carbon fuels
• Disadvantages: would provide less stable annual funding due to annual changes in marginal sources
• Advantages: sends stronger message to retire older resources and to develop new lower carbon fuels

Example: Utility x sells 100,000 GWh per year into the California grid and has an average annual emissions factor of 700 pounds of CO_2 per MWh and the marginal 10% of the annual energy provided has an emissions factor of 1,600 pounds of CO_2 per MWh. If 60% average and 40% marginal weighting is used, Utility x's funding emission's factor is 10,600 pounds per MWh.

Utility x's portion of the funding for the administration of AB32 becomes

(100,000GWh * 10,600 pd/Mwh)
---
sum of all Cal sales(energy * funding emissions factor)

10. Page 41: High energy costs have a disproportionate effect on low income families. If carbon fees are implemented, consider doubling the carbon fee on gasoline and rebate 50% of the fee as a state income tax credit, say:
• $3,000 for 10% and lower tax bracket families
• $0 for 20% and higher tax bracket families
• Interpolate between 10% and 20% tax bracket's
Optionally, a portion of the 50% that is to be credited could fund:
• Weatherization and efficiency upgrades to low-income homes
• Public transit infrastructure
• Public transit fare-box subsidies
• Green collar job creation

11. Page 41: Consider including carbon fees on imports into California to:
• Sensitize importers to carbon footprint of their products
• Reduce leakage of business from California
• Provide level playing field for in-state produced goods that meet carbon regulations
• An import fee will address CMUA's concern about the high cost of business in California

Some examples might include:
• Cement (and other products) that is (are) produced using coal powered electricity.
• Carpet: NSF/ANSI 140-2007 Platinum carpet would have no surcharge; Gold might have $1 per square yard surcharge; silver might have $2 per square yard surcharge, etc.
• New Vehicles: This would be in addition to AB1493 and would be based on expected annual fuel use and expected vehicle life.
• Food imports: Based on transportation costs, farming and fertilizing methods.

12. Page 41: Consider recommending to local governments that they include VOLUNTARY carbon surcharges on services that they provide to:
• Provide source of new revenue
• Gage residents acceptance of addressing climate change in their community
Some examples might include:
• Water Services: Water pumping is approximately 25% of the City

of Sacramento's municipal operations carbon footprint. Less than a 2% surcharge on typical City water bill would allow the City to purchase renewable power for all City potable, sanitary and storm treatment and pumping.
• Solid Waste Services: Solid Waste Operations (fuel, electricity, etc.) and methane generation at landfill accounts for approximately 10% of the City of Sacramento's municipal operations carbon footprint. Less than a 10% surcharge on typical City solid waste bill would allow the City to purchase renewable power for all City solid waste operations and to plant additional urban forest to offset fuel used by trucks and fugitive methane generation from landfill.
• Room/ Site Rental Fees: Libraries and Community Centers can offer carbon neutral room rentals
• Convention Center Rental Fees: Convention Centers can offer carbon neutral events

13. Page 41 and 47: For carbon fees that are collected from imports into California, consider:
• Providing sustainable community grants to local governments
• Funding county-wide and city-wide greenhouse gas inventory efforts and annual reporting
• Granting funds to local jurisdictions based on their efforts to move their community towards sustainable operations (see additional comments on developing a sustainability matrix).

14. Page 47: under "Incentives To Local Governments": For cities to assist in achieving the goals of AB32, a sustainable funding mechanism needs to be developed. Below are some concepts that might be considered.
• New Construction: Recommend using PUC or POU collected Public Goods Charge (PGC) to provide incentives to local governments to ensure that energy efficient construction that exceeds Title 24 requirements is achieved; perhaps $0.10 per square foot for minimum compliance of Title 24 + 15%, $0.15 per square foot for 20%, $0.25 per square foot for 30%. Residential incentives might be per unit instead of per square foot.
o Oversight needed (perhaps) by State to ensure validity of Title 24 calculations and inspections.
• Point Of Sale (POS) Ordinances: Energy efficiency targets for existing building stock identified on page 21 indicate that Sacramento's share of the requested improvements, on the average, will require EVERY BUILDING IN THE CITY OF SACRAMENTO (as an example) to be 10% to 12% more efficient than current. Recommend using PUC or POU collected Public Goods Charge (PGC) to fund enforcement of point of sale ordinances for residential and commercial construction; perhaps on a cost per square foot level. Residential incentives might be per unit instead of per square foot.
o Implement a statewide public relations campaign to identify advantages of POS ordinances to stakeholders, including realtors and BIA.
o BIA might be an ally if fees are NOT collected from new development.
• Solar Water Heating and Solar Photovoltaic: Solar targets identified on page 21 are daunting for City of Sacramento (i.e. 2,500 solar water heaters and 13,000 solar photovoltaic systems); recommend using PUC or POU collected Public Goods Charge (PGC) to provide incentives to local governments to assist in achieving goals. Incentive to local governments should be based on annual solar fraction installed, say $100 per kW.
• Carbon Neutral Land-Use Ordinance (CNLO): Improving the

efficiency of new and existing building stock addresses a portion of the workload of local governments; another portion of the workload that affects energy usage is land use planning and transportation options that are available to the community.
o See Attachment A

15. Page 47, Incentives to Local Governments: Property Taxes, Feebates and Land Use: It is somehow necessary to defiscalize land use so that cities are not joyous when big boxes and auto malls come to town. It may be possible to incent local governments to enforce a CNLO by applying a feebate type concept to property tax DISBURSEMENTS, not collections. For example, a project that is built that STRONGLY meets the intent of a CNLO might cause 120% of the normal property tax disbursements to be made to the local jurisdiction from the County; a project that is built that LIGHTLY meets the intent of a CNLO might cause 80% of the normal property tax disbursements.
• This could have a cascade effect in that the local jurisdiction could then provide incentives to project developers for projects that heavily meet the CNLO AND/OR could charge higher fees for projects that lightly meet the CNLO.
• Feebate concept might also be applied to property tax COLLECTIONS and thus motivate project developers to meet AB32, but this would have to be coordinated with Proposition 13.
• The problem with the use of feebates is that many projects need to NOT comply (or lightly comply) to an action so that they can be charged higher fees in order for other projects to receive a rebate for heavily complying with the action.
• Additional problem with feebates is that somebody has to determine which projects heavily comply or lightly comply with CNLO… perhaps IPLACE3S might be used for this determination?

16. Page 47, Incentives to Local Governments: Sales Taxes, Feebates, and Land Use: This concept is similar to Property Taxes and Feebates concept identified above, except that by applying to 2 sources of a local jurisdictions income (Property Taxes and Sales Taxes), the overall unit rate for each would be lower.

17. Page 47, Incentives to Local Governments: Property Taxes, Sales Taxes, Feebates and General Sustainability: The concept of sustainability goes far beyond land use decisions. For property tax disbursements and for sales tax disbursements that are not subject to land-use feebates, consider developing a matrix of general sustainability issues (landfill diversion, per capita waste reduction improvements, meeting communitywide greenhouse gas reduction goals, water use efficiency improvements, etc.) and use the results of the matrix annually to adjust property tax disbursements to local jurisdictions… higher than normal if they do well and lower than normal if they don’t do well:
• Potential program should be designed so that local jurisdictions would tend to work with each other and not against each other (perhaps use regional information instead of jurisdictional information?).
• Potential program should start out with a range of 99% to 101% of normal property tax disbursements to be used as a shake-down period and increase over time to say 95% to 105% (or whatever is necessary).
i. Ideally, the State could find additional funds (e.g. fees from carbon imports) to supplement sales tax disbursements to Cities such that all cities are made whole and that initial range of disbursements starts at 100% to 102% instead of 99% to 101%

18. Page 47, Incentives to Local Governments: Local governments, as tax exempt corporations, have to resort to convoluted lease-to-own or Power Purchase Agreements in order to install solar energy systems cost effectively. Solar photovoltaic systems are NOT rocket science and city building maintenance folks are eager to install solar project, could do a wonderful job at installing, would learn and become more aware of the issues, BUT THEY CAN'T DO THE WORK AS IS BECAUSE FEDERAL TAX CREDITS DRIVE THE COST

• Consider working with Federal government to allow tax exempt corporations (like Cities) to auction, sell, or otherwise benefit from tax credits without having to engage third parties.

• Develop state tax credits that tax exempt organizations can take advantage of (similar to Oregon law).

19. Page 47: It would be reasonable to use carbon fees that are collected from a new construction project to fund the incremental cost of a renewable power plant. This is similar to Indirect Source Rules that some air quality districts are developing.

Example: SMUD's Greenergy renewable energy product costs a premium of 1c/kWh; a typical new building uses 15 kWh per SF per year and will operate for approximately 50 years. A carbon fee of $7.50 per square foot (1c/kWh * 15 kWh/SF * 50 years) would allow the new construction project in question to be considered near-carbon free.

20. Page 71, Program Funding: An additional source of funding for the program could be a $/ton fee for organic waste that is landfilled.

21. Page 71: CIWMB Fees and Feebates: CIWMB is currently funded based on a fixed cost per ton of waste that is landfilled. Consider using a feebate type concept and modifying fees that are collected from landfills such that organic wastes (and other landfill inappropriate materials) have HIGHER charges and inorganic wastes have LOWER charges. Total collections would remain unchanged, but would incent landfill owners to keep greenhouse gas generating materials out of the landfill.

22. Page 71: Consider basing fees on carbon intensity, not on energy units. For example, some utilities have average annual emissions factors of approximately 500 pounds per MWH, other utilities have emissions factors approaching 2,000 pounds per MWH. By charging fees based on carbon intensity, utilities and refiners will have greater incentive to reduce carbon intensity of their products.

Attachment A- CNLO

Attachment A

Carbon Neutral Land Use Ordinance (or other reasonable name)

The Carbon Neutral Land Use Ordinance (CNLO) is intended to encourage community planning as opposed to project-by-project planning.

CEQA Significance Threshold: Any new construction or major remodeling project that generates new carbon dioxide emissions is significant due to the cumulative, non-dissipating effects of carbon dioxide. Any project that :

[emits less than [50] metric tons per year of direct and indirect carbon dioxide emissions]
[has less than 100 peak hour trips or 1,000 daily trips]

may use the Prescriptive method of compliance and avoid the need to perform an EIR unless other aspects of project require EIR. Projects larger than the:

[50] metric tons per year emissions threshold]
[has greater than 100 peak hour or 1,000 daily trips]

must use the Performance based approach identified below.

Carbon Dioxide Mitigation Time Table: All new construction projects:

[emitting greater than [50] metric tons per year of CO_2 emissions, but less than [900] metric tons per year of CO_2 emissions]
[greater than 100 peak hour trips/day or 1,000 trips per day but smaller than a General Plan Amendment, a Specific Plan (or similar), or a Project as defined by SB 221 or 610]

must mitigate 35% of their carbon emissions in 2008 and increase at the rate of 5% per year until all new construction projects are carbon neutral by 2026. The applicable time date for this requirement is date of permit issuance.

All projects:
[greater than [900] metric tons of CO_2 emissions per year]
[equivalent to a General Plan Amendment, a Specific Plan (or similar), or a Project as defined by SB 221 or 610]

must mitigate 100% of their emissions through a combination of on-site and off-site measures.

In 2007, the per capita emissions rate for Californians was 14 metric tons per person per year; in the absence of better data on project carbon dioxide emissions, this default value will be used to achieve 10.5 metric tons per person per year in 2008 and ratcheting down to 0 metric tons per person per year by 2026.

Compatibility with Title 24 : This ordinance is intended to complement Title 24 and does not conflict. If any incompatibility is found between Title 24 and this ordinance, Title 24 rules. This ordinance addresses several issues not covered by Title 24:
• This ordinance address vehicle miles travelled in order to properly use the development. Vehicle use- both company owned and staff owned.
• Building energy use is covered by Title 24
• Comparing project characteristics to those in the nearby community
• [indirect emissions associated with procurement and contracting choices]

Leakage Clause : This ordinance will not take effect until [75%] of the jurisdictions (by population) within the 6 county SACOG planning region adopt a similar ordinance or unless the State (or AQMD?) passes a law (or regulation) that supersedes the need for this ordinance.

Direct Emissions (Scope 1): Direct emissions are those that are

generated on-site through burning of fossil fuels in stationary and mobile equipment.

Indirect Emissions (Scope 2): Indirect emissions are those that are generated by a utility company that provides energy services to the project, most commonly electricity services

Indirect Emissions Associated With Procurement And Contracting Choices (Scope 3): Building users can reduce their carbon footprint based on products that they purchase and in choosing the businesses that they contract with. For example the use of 100% recycled content paper produces fewer carbon dioxide emissions than regular paper.; fuel used by contractors to deliver/haul firms products... how to measure and regulate… BERC certification??

Pre-Approved Land Use Designations: To assist in making sites shovel ready for development, the City has the option of doing the required study indicated under the Performance compliance method and to identify acceptable projects that meet the requirement of this ordinance, thus eliminating the need for the project to do this study in the CEQA document.

Climate Action Trust Fund (CATF): The CATF is used to mitigate the carbon dioxide emissions of projects by installing projects off-site that reduce emissions locally. Examples of these projects include: (1) low income home weatherization; (2) funding incremental cost of renewable power plants; (3) planting trees; (4) water conservation.
• An alternative compliance mechanism will be provided for those that wish to perform off-site mitigation through a CARB/AQMD certified process

Mandatory Measures Checklist: All items on this checklist must be complied with whether the Prescriptive or Performance Compliance methods are used.
• Projects exempt from Title 24 must be at least [15%] more efficient than business as usual design.
• Projects must be at least [15%] more efficient than Title 24 requires.
• Firms with greater than [25] employees will have a Transportation Systems Management Plan that reduces single occupant vehicle usage by [35%] relative to business as usual.
• Firms with greater than [25] employees that has a company fleet will have it’s fleet evaluated at least once every four years by the Sacramento Metropolitan AQMD. The overall make-up of the corporate fleet will comply with Rule xxx .
• Firms must purchase at least [80%] of their printer and copier paper as 100% recycled content, post consumer content waste, and unbleached.

Prescriptive Compliance Approach: This section of the ordinance will be updated tri-annually to ensure that this simpler compliance method meets the intent of the Carbon Dioxide Mitigation Time Table. For projects installed after 2008, the following is required in addition to the Mandatory Measures checklist:
• Project must conform with Pre-Approved Land Use Designation for the site.
and
• Project must be at least [15%] more efficient than the 2005 Title 24 energy code requires or Project must pay $[0.20] per

gross square foot of floor space into the CATF for each percentage point (or part of) that the project falls below the [15%] minimum efficiency threshold to a maximum of [$3.00] per gross square foot.

Performance Compliance Approach: This approach requires a project that exceeds the threshold identified above to include a carbon analysis in the CEQA documentation of actual and proposed development within 2 mile radius of CEQA regulated project. At a minimum, the following shall be included in the study:
(a) actual job count and living unit count
(b) estimated salary ranges of dwellers in the study area and rental/mortgage costs
(c) projected job count and living unit count when study area is built out per requirements of General Plan
(d) number of amenities within ½ mile of each residential unit;
(e) percentage of dwelling units that are within ½ mile of a RT designated transit stop that has a level of service (LOS) A = > 150 stops per week(??); and LOS B (120-150??), C (80-120?), D (50-80?), E (20-50?) and F = < 20 stops per week ??
(f) percentage of businesses that are within ½ mile of a transit stop that has a level of service (LOS) A = > 150 stops per week; and LOS B, C, D, E and F = < 20 stops per week??
(g) ??

Based on accepted planning criteria(?), the study shall use the above facts and estimates to determine :
(a) Correlation between estimated salary ranges of workers and rental/mortgage costs and how that correlation affects vehicle miles travelled within the study area
(b) Vehicle miles travelled per year to work within the study area and per household
(c) Bar graph of the number of amenities that are located within ½ mile of each living unit in the study area (both actual and built out).
(d) Per capita emissions of project in most significant units, usually in metric tons per person per year.

If analysis proves to be beneficial to the study area, development fees will be reduced by xx%; if analysis proves to not be beneficial to the study area, development fees are to be increased by yy%. In either case, compliance with the Carbon Dioxide Mitigation Table is required for direct and indirect emissions associated with the project.

Attachment: www.arb.ca.gov/lists/sp-design-ws/80-carb-ab32-scoping-plan-080801.doc

Original File Name: CARB-AB32-Scoping-Plan-080801.doc

Date and Time Comment Was Submitted: 2008-08-01 16:53:36

No Duplicates.

Comment 78 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Stephen
Last Name: Asztalos
Email Address: SJAsztalos@lbl.gov
Affiliation:

Subject: Offsets
Comment:

Dear Board members,

As a physicist and concerned California resident I am writing to express my opposition the offset methodology proposed in the scoping plan. Offsets were a sensible notion prior to the era of formal regulation of greenhouse gases: regardless of their motivation, individuals or coorporations could choose to compensate for their C02 generation. Scaled up to the level of a populous state, offsets would likely be a nightmare. Near-term history has taught us that efficacy of offsets are difficult to quantify. By virtue of such an indirect mechanism, it is unclear whether the beneficiary of the C02 offset would have proceeded with the project in absence of remuneration or not. There is plenty of indirect evidence that such projects would have proceeded in any event - in such cases the remuneration would have had no effect.

It is widely recognized by economists of all ilk that carbon taxes are the most direct way to influence market behavior. In lieu of carbon taxes, a cap and trade mechanism is thought to be a reasonable, though less efficient, alternative. Offsets are a distant third choice as they have the potential for misinterpreation, political corruption. Indeed, the whole notion of offsets is inherently ambiguous. For these reasons, I would advocate that offsets play a minor role in an implementation of AB 32. The quickest and most cost effective way to reduce C02 levels is to send the strongest signal possible to the polluters - offsets do not meet that test.

Dr. Stephen Asztalos
Oakland, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 17:06:23

No Duplicates.

Comment 79 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: LeiLani
Last Name: Johnson Kowal
Email Address: leilani.johnson@ladwp.com
Affiliation: Los Angeles Dept. of Water and Power

Subject: LADWP Comments on Draft Scoping Plan
Comment:

```
Attached please find the Los Angeles Department of Water and
Power's comments on the Draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/82-ladwp_comments_8-01-2008_final.pdf

Original File Name: LADWP Comments_8-01-2008_final.pdf

Date and Time Comment Was Submitted: 2008-08-01 17:18:59

No Duplicates.

Comment 80 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Adam
Last Name: Stern
Email Address: astern@terrapass.com
Affiliation: TerraPass Inc.

Subject: AB 32 Program Design
Comment:

```
Please find our comments attached. Thanks.  - Adam Stern
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/83-terrapass_comments_on_ab_32_draft_plan__8-01-08_.doc

Original File Name: TerraPass comments on AB 32 draft plan (8-01-08).doc

Date and Time Comment Was Submitted: 2008-08-01 17:22:54

No Duplicates.

Comment 81 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Stephen
Last Name: Asztalos
Email Address: SJAsztalos@lbl.gov
Affiliation:

Subject: No free allowances
Comment:

Dear Board members,

As a physicist and concerned California resident I am writing to express support for the notion of an auction to distribute pollution allowances. If there is any clear message from the European foray into the cap and trade arena it is the recognition that a big opportunity was missed when allowances were freely distributed. The European system is still trying to recover from the the initial giveway of their allowances and the low price assigned to pollution rights. In California it must be established upfront that pollution has attendant costs. No clearer signal exists (save a carbon tax) than to assign a particular dollar amount to a particular volume of CO2 pollution. Prior knowledge that allowances are costly will "incentivize" polluting industries to limit their C02 emissions. There is absolutely no justification for giving away allowances save political expediency.

Dr. Stephen Asztalos
Oakland, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 17:24:49

No Duplicates.

Comment 82 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: SUE
Last Name: KATELEY
Email Address: INFO@CALSEIA.ORG
Affiliation: CALIFORNIA SOLAR ENERGY INDUSTRIES ASSOC

Subject: COMMENTS ON SCOPING PLAN
Comment:

PLEASE SEE ATTACHED

Attachment: www.arb.ca.gov/lists/sp-design-ws/85-scoping_plan_final_comments.pdf

Original File Name: Scoping Plan Final Comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 17:27:41

No Duplicates.

Comment 83 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

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

Subject: Carbon Tax
Comment:

While I am not an economist, I have been very struck by the website, carbontax.org which contains the writings of Charles Komanoff. Rather than offering a series of links to articles and publications there, I urge CARB to thoroughly explore the site.

I see several very large advantages to carbon taxes, as compared to cap and trade programs:

Cap and trade will require the creation of new institutions and expertise, which will be very costly. The thousands of lawyers and investment bankers that will be needed to make it work will add tremendous cost to the emissions reduction process. Conferences currently being offered on the business opportunities that will be created by cap and trade suggest that vast sums that otherwise could go back to the public, or into emissions reduction projects will be siphoned off by entrepreneurs. A carbon tax will be simple and inexpensive to administer and will not require an army of lawyers. The proceeds of the tax could be used to create cost-effective transit systems, as well as other low-carbon mitigations. Another possibility is to return the entire proceeds to taxpayers, to offset the increased cost of consumer goods.

Another tremendous problem with cap and trade is the potential for sophisticated gaming. (Think of how Enron manipulated the California energy market.) A carbon market would appear quite opaque and arcane to the public. A carbon tax, on the other hand, is very straightforward. It should be easy to catch bad actors.

The chief benefit cited for cap and trade is the certainty that the target will be achieved. This is dubious: if the system is itself flawed, as was Europe’s, or if it is gamed, it won’t achieve its goal. On the other hand, a carbon tax can be adjusted in response to observations of energy consumption levels. This isn’t rocket science!

I urge CARB to conduct a full public evaluation of the potential benefits of a carbon tax before being stampeded by the business community into adopting cap and trade. The very popularity of cap and trade with the business community should be enough to cause CARB to stop and evaluate whether implementing it would truly be in the public interest.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 18:50:24

No Duplicates.

Comment 84 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Bill
Last Name: Buchan
Email Address: buchan@mktpotential.com
Affiliation: Graphics Packaging

Subject: Carbon Fees on Fuels
Comment:

The ARB is considering a carbon fee on fossil fuels used. The carbon fee would be approximately $0.05/therm. ARB is considering this fee to dissuade continued use of fossil fuels. With natural gas costs at $13/1000cf and crude oil costs above $120/bbl (after cresting above $140/bbl), such a tax would only serve to pile on the already costs of these fossil fuels which have risen to extraordinary levels over the 24 months. Current costs are plenty of incentive to look at alternative energy sources or determine ways to conserve. The proposed tax would do nothing to change current behaviour. Proponents of this concept assume further that alternatives are available to all users of fossil fuels. This is not the case. Before considering this tax further, the ARB should look at the feasibility of implementing an alternative, otherwise the tax would unfairly raise costs for those without a feasible cleaner alternative. At this juncture, this tax is a bad idea that would only serve to raise the cost of business, and ultimately the cost of living to Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 19:17:32

No Duplicates.

Comment 85 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Alexander
Last Name: Clayton
Email Address: AlexRClayton@gmail.com
Affiliation: Sierra Club, Coop America

Subject: Additional Education and Comment Period: Taxes vs. Cap & Trade
Comment:

In addition to my previous comments, I would like to see CARB conduct educational sessions to allow citizens to better understand the pros and cons of carbon taxes/fees vs. a cap and trade system, and subsequently, allow for an extended comment period to make our voices heard.

The Congressional Budget Office's analysis found a taxation system to be a better fit for reducing GHGs: "...any long-term emission-reduction target could be met by a tax at a fraction of the cost of an inflexible cap-and-trade program. That cost savings stems from the fact that a tax could better accommodate cost fluctuations while simultaneously achieving a long-term emission target." Thus, it seems prudent to opt for more education and information before proceeding, as we need to better grasp our options and choose the one best suited to reach our goal of reducing GHG emissions.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 19:54:26

No Duplicates.

Comment 86 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Bill
Last Name: Buchan
Email Address: buchan@mktpotential.com
Affiliation: Graphics Packaging

Subject: Cap-and-Trade
Comment:

```
We are pleased ARB is employing a cap-and-trade system under AB 32.
 However, the program is proposed to be limited to the
transportation, electricity, industry, and commercial/residential
sectors.  The Cap-and-trade program is meant to encourage
reductions in greenhouse gas emissions and provide a mechanism to
identify the most inexpensive means of accomplishing these
reductions.  What difference does it make if the project to reduce
greenhouse gases is a Park Service facility?  Toward this end,
there should be no limits on the types of facilities that
cap-and-trade reduction projections can apply.  All facilities
should be eligible as reduction projects at the start of the
program.  This will ensure that the maximum number of projects are
encouraged for the most inexpensive cost, a goal that is good for
all Californians.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 20:46:09

No Duplicates.

Comment 87 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Cathy
Last Name: Karlstad
Email Address: Cathy.Karlstad@sce.com
Affiliation: Southern California Edison

Subject: SCE's Comments on the Draft Scoping Plan
Comment:

```
Attached please find Southern California Edison Company's comments
on the Draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/90-sce_comments_on_carb_draft_scoping_plan.pdf

Original File Name: SCE Comments on CARB Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 22:41:41

No Duplicates.

Comment 88 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: John
Last Name: Diener
Email Address: john@rrrinc.net
Affiliation: Westside Resource Conservation District

Subject: Carbon fees to fund incentives to farmers to adopt clean energy
Comment:

Revenues from carbon fees can fund incentives for California farmers to adopt clean energy technologies such as solar photovoltaics, concentrated solar power, and wood gasification. The San Joaquin Valley Air Pollution Control District and other air quality control districts already monitor clean air farming practices such as integrated pest management (the use of both biological and chemical control of weeds, bugs, fungi, and soil borne organisms) to minimize spraying and fumigating with pesticides; using spraying equipment with optical sensors to minimize the amount of pesticides sprayed; conservation tillage to reduce the number of tractor trips across fields and the disturbance of the soil to diminish dust, diesel, and CO2 emissions; and applying road oil on dirt roads to reduce fugitive dust emissions. The USDA Natural Resource Conservation Service funds many of these practices specifically to diminish air pollution coming from farms. The California Air Resources Board could use the air pollution control districts' clean air farming practices monitoring data bases to identify farmers who are already helping clean up the air and the USDA Natural Resource Conservation Service to administer the award of incentive payments that reduce the cost of clean energy equipment to those farmers who have contributed the most to cleaning up the air. Carbon fee revenues would fund the air quality control districts' sharing of clean air farming practices data and the cost of administering the payment of incentives to "Clean Air Farmers" by the USDA Natural Resource Conservation Service to install clean energy equipment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-03 17:30:55

No Duplicates.

Comment 89 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: steven
Last Name: sias
Email Address: steve.sias@att.net
Affiliation: Catholic Church

Subject: AB32 Program Design
Comment:

```
• Make sure that low-income communities are not harmed.
• Use funds generated by AB 32 to invest in "green jobs" training
and education programs in low-income communities.
• Prohibit giving away free pollution credits to companies. Make
sure polluters pay the full cost of the pollution they create.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 07:30:36

No Duplicates.

Comment 90 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Cathy
Last Name: Reheis-Boyd
Email Address: cathy@wspa.org
Affiliation: Western States Petroleum Association

Subject: AB 32 Scoping Plan Design
Comment:

```
Attached are comments from the Western States Petroleum Association
on the AB 32 Scoping Plan. These comments were transmitted to CARB
on August 1, 2008.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/93-carb_scoping_plan_080108.pdf

Original File Name: carb scoping plan 080108.pdf

Date and Time Comment Was Submitted: 2008-08-04 12:48:42

No Duplicates.

Comment 91 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Ann
Last Name: Hancock
Email Address: ann@climateprotectioncampaign.org
Affiliation: Climate Protection Campaign

Subject: Cap and Dividend
Comment:

```
Dear Chair Nichols, Board members, and staff,

Please include in the Final Scoping Plan:

- The State should auction 100% of emission permits under the cap.
Companies bringing fossil fuel into the California economy should
pay for their emissions. The right to emit GHG should not be given
away. Doing so subsidizes fossil fuel such as oil and coal, and
prolongs the transition to clean, renewable energy.
- The State should use all auction revenue to provide a Dividend
to compensate consumers on a per capita basis.  Given our high
fossil fuel prices, helping consumers protects California's
economy, addresses the regressive impacts of increasing fossil
fuel prices, speeds the transition to renewables, ensures the
durability of climate solutions, and is therefore the fairest and
most powerful use of auction revenues.

I support CARB's proposal for Carbon Fees on fossil fuel companies
to help fund CARB's implementation of AB32. Carbon Fees can also
provide funding sources for clean technologies, green jobs, energy
efficiency programs, and more.

Thank you for all your work.

Sincerely,

Ann Hancock
Climate Protection Campaign
www.climateprotectioncampaign.org
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 14:05:33

No Duplicates.

Comment 92 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Elizabeth
Last Name: Hadley
Email Address: ehadley@reupower.com
Affiliation: City of Redding;Redding Electric Utility

Subject: City of Redding & Redding Electric Utility Draft Scoping Plan Comments
Comment:

```
Please find the attached comments from the City of Redding and
Redding Electric Utility on the AB 32 Draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/95-city_of_redding___reu_scoping_plan_comments.pdf

Original File Name: City of Redding & REU Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-08-04 16:36:43

No Duplicates.

Comment 93 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Paul
Last Name: Buttner
Email Address: pbuttner@calrice.org
Affiliation:

Subject: Revised Comment Letter on Draft Scoping Plan
Comment:

```
Please find this revised version of the California Rice
Commission's August 1, 2008 comment letter.  The only change was
to add additional information to paragraph three. Thank you.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/96-climatechangescopplan_rev1_.pdf

Original File Name: ClimateChangeScopPlan(Rev1).pdf

Date and Time Comment Was Submitted: 2008-08-04 16:50:25

No Duplicates.

Comment 94 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Jason
Last Name: Barbose
Email Address: jason@environmentcalifornia.org
Affiliation: Coalition of environmental organizations

Subject: Cap and Trade Program Design in Draft Scoping Plan
Comment:

```
From:
Andy Katz, Breathe California
Tam Hunt, Community Environmental Council
Mike Sandler, Climate Protection Campaign
Shankar Prasad, Coalition for Clean Air
Daniel Emmett, Energy Independence Now
Jason Barbose, Environment California
Kristin Grenfell, Natural Resources Defense Council
Bill Magavern, Sierra Club California
Christopher Busch, Union of Concerned Scientists

Re: Cap and Trade Program Design in Draft Scoping Plan

A coalition of environmental organizations respectfully submits
the attached comments regarding the proposed cap and trade program
design.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/97-scoping_plan_cap_and_trade_design_comments.pdf

Original File Name: Scoping plan cap and trade design comments.pdf

Date and Time Comment Was Submitted: 2008-08-04 17:40:07

No Duplicates.

Comment 95 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Jason
Last Name: Barbose
Email Address: jason@environmentcalifornia.org
Affiliation: Coalition of environmental organizations

Subject: Including Natural Gas within Cap and Trade
Comment:

```
From:
Andy Katz, Breathe California
Tam Hunt, Community Environmental Council
Jason Barbose, Environment California
Derek Walker, Environmental Defense Fund
Kristin Grenfell, Natural Resources Defense Council
Cliff Chen, Union of Concerned Scientists

Re: Natural Gas under Cap and Trade

A coalition of environmental organizations respectfully submits
the attached comments regarding the inclusion of the natural gas
sector in a cap and trade program.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/98-natural_gas_in_the_cap.pdf

Original File Name: Natural gas in the cap.pdf

Date and Time Comment Was Submitted: 2008-08-04 17:45:38

No Duplicates.

Comment 96 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Norman
Last Name: Pedersen
Email Address: npedersen@hanmor.com
Affiliation: Southern California Public Power Author

Subject: Southern California Public Power Authority Comment on Draft Scoping Plan
Comment:

```
Please find attached the Southern California Public Power Authority
Comment on Draft Scoping Plan submitted to the Air Resources Board
on 8/1/08.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/99-300226001nap08010801.pdf

Original File Name: 300226001nap08010801.pdf

Date and Time Comment Was Submitted: 2008-08-04 19:05:11

No Duplicates.

Comment 97 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: John
Last Name: Onderdonk
Email Address: john.onderdonk@caltech.edu
Affiliation: California Institute of Technology

Subject: Caltech Draft Scoping Plan Comment
Comment:

```
Please see attached comment
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/101-caltech_draft_scoping_plan_comment.pdf

Original File Name: Caltech Draft Scoping Plan Comment.pdf

Date and Time Comment Was Submitted: 2008-08-06 09:41:28

No Duplicates.

Comment 98 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Steven
Last Name: Kelly
Email Address: steven@iepa.com
Affiliation:

Subject: Comments of the Independent Energy Producers Association
Comment:

```
Comments of the Independent Energy Producers Association
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/102-iep_comments_on_carb_climate_change_draft_scoping_plan__--__final__8-6-08__.doc

Original File Name: IEP Comments on CARB Climate Change Draft Scoping Plan -- FINAL (8-6-08) .doc

Date and Time Comment Was Submitted: 2008-08-06 11:48:55

No Duplicates.

Comment 99 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: William
Last Name: Westerfield
Email Address: wwester@smud.org
Affiliation: SMUD

Subject: SMUDs Comments
Comment:

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Submitted August 1.  Please contact Araceli if there are any
questions. 916 732-6447
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Attachment: www.arb.ca.gov/lists/sp-design-ws/103-smuds_complete_comments_on_ab_32_dsp.pdf

Original File Name: SMUDs Complete Comments on AB 32 DSP.pdf

Date and Time Comment Was Submitted: 2008-08-06 15:03:38

No Duplicates.

Comment 100 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Kimberly
Last Name: Hughes
Email Address: khughes@mtc.ca.gov
Affiliation: Metropolitan Transportation Commission

Subject: Recommendations for Improving Draft AB 32 Scoping Plan
Comment:

August 6, 2008

Ms. Mary D. Nichols
Chair
California Air Resources Board
Sacramento, CA 95814-2719

Dear Chair Nichols:

Recommendations for Improving Draft AB 32 Scoping Plan

The Metropolitan Planning Commission (MTC) is the federally designated Metropolitan Planning Organization (MPO) for the San Francisco Bay Area. Our core responsibility is to plan and finance transportation investments for the nine-county Bay Area. In pursuit of that responsibility, we coordinate our work with that of our sister regional agencies: the Association of Bay Area Governments (ABAG), the Bay Area Air Quality Management District (Air District), and the Bay Conservation and Development Commission (BCDC).

The four agencies are jointly implementing a Climate Protection Program to address is-sues related to global warming. Our joint program recognizes the critical role that urban development and transportation will have to play in addressing our climate challenges. It is from this perspective that we submit the following four recommendations for improv-ing the Draft Scoping Plan that was released by your agency in June.

1. Separate Measure #13 “Local Government Actions and Regional GHG Targets” into two distinct measures with separate emissions reduction targets.

Measure #13 as presently structured mixes soup and nuts in a manner which makes re-sponsibility unclear, complicates the tracking of progress, frustrates assertive and coordi-nated action, and diffuses accountability for results. We recommend, instead, that two distinct measures be created in the scoping plan.

A “Transportation and Land Use” measure should focus on coordinated regional/local planning of land use and transportation development so as to reduce the region’s carbon footprint. This is a multi-faceted effort involving (a) the regional “blueprint” processes, (b) local cities and counties as the entities with

specific land-use authority, and (c) re-gional, county-level and local transportation projects. In administrating this measure, it is essential that an emissions target be set at the regional level. Most vehicular travel occurs within the metropolitan region, frequently crossing local-government boundaries, and "vehicle miles traveled" reduction goals are not appropriate to set, measure, or monitor at less than the regional "commuter shed."

A "Local Government Actions" measure should focus on community energy, waste, re-cycling, water and other non-transportation/land use actions that are appropriate at a city/county scale for planning and implementation. As the draft plan states, these types of actions can be expected to provide significant GHG reductions in addition to those achieved through transportation and land-use planning. A separate emissions target should be set for these important local government actions.

2. Enhance the 2 MMT emissions reduction target currently set for Measure #13.

A more ambitious target is definitely needed for the strategy overall—we should not sell its potential short. In addition, some areas, like the San Francisco Bay Area, have a head start in thinking about the connection between better integrated land use/transportation strategies. These regions should be encouraged to do more/faster.

Most importantly, we need to start making significant changes now if we are to achieve the very large emissions reductions required by 2050. While AB 32 mandates a reduction from the current 14 tons/person to 10 tons/person by 2020, the 2050 target established by the Governor's Executive Order pushes us down to 1.5 tons/person! The significant land use changes and VMT reduction that will be needed for that "California makeover," must begin today. Land use changes take time. Therefore it is critical that we lay the founda-tion between now and 2020. This time period is also important for producing great devel-opment projects that can show the way and become our "learning laboratories."

Therefore, we recommend a "tiered" approach to GHG reduction targets for these strate-gies:

· A "basic" target that represents a regulatory floor. We assume some "penalty" would be assigned or some supplemental action triggered for areas that did not reach their share of that mark.

· An "aspirational" target would be set based on those areas who are committed and have the capacity to deliver land use/transportation changes more quickly.

To reward and motivate such actions, fiscal incentives would be awarded to those entities pursuing actions at a level commensurate with the higher aspirational target. These incen-tive could be drawn from existing sources of state infrastructure assistance (e.g. transpor-tation funding through the CTC/Caltrans; housing funds via HCD) OR could be pursued as new funding sources dedicated for this purpose.

3. Move pricing strategies from the "under consideration" list to the Scoping Plan.

While land use will take years to provide large reductions in GHGs, pricing strategies can be implemented in much shorter time frames and can produce significant results by 2020. One only has to look at the last year in California to see how higher gas prices have re-duced driving, increased transit use and spawned a vibrant public dialogue about a series of related topics, including housing development. We believe that HOT lanes, cordon pricing, bridge tolls, parking policies, pay-as-you-drive insurance and other pricing strategies will have an equally powerful impact on VMT and GHGs.

Recognizing that the Air Resources Board is under a tight deadline to complete the final Scoping Plan and not wishing to burden you with excessive correspondence, we have not elaborated our recommendations in great detail. Nevertheless, we would be happy to work with your staff over the next few months if required to refine how these suggestions could be reflected in the final plan.

4. Include an initiative to improve our ability to accurately measure vehicle miles traveled (VMT) and resultant carbon emissions.

Finally, to make this process work, the State and the regional agencies must develop a new, accurate and consistent method of measuring VMT. We currently only estimate VMT very indirectly. We do not actually measure it. A process like AB 32 demands measurement and reporting that is reliable and believable, two qualities seriously lacking in our current VMT estimates. We must be able to talk about transportation VMT with the same confidence that other sectors discuss kilowatt hours, renewable portfolio stan-dards, etc. ARB and the regional agencies should convene a working group as soon as possible to recommend the way forward on this critical technical piece. To the extent that achieving VMT reduction targets are contemplated as part of any AB32 regulation, the application of accurate, consistently applied measuring and monitoring mechanisms for VMT become especially critical.

Sincerely,

Therese McMillan
Deputy Executive Director

Attachment: www.arb.ca.gov/lists/sp-design-ws/104-l-ab_32_comment_letter_080608.pdf

Original File Name: L-AB 32 Comment Letter 080608.pdf

Date and Time Comment Was Submitted: 2008-08-06 15:11:06

No Duplicates.

Comment 101 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Kristin
Last Name: Grenfell
Email Address: kgrenfell@nrdc.org
Affiliation: NRDC

Subject: NRDC Comments on Program Design in Draft Scoping Plan and Appendices
Comment:

```
NRDC respectfully submits these comments on Program Design.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/105-nrdc_program_design_comments_on_draft_scoping_plan.pdf

Original File Name: NRDC Program Design Comments on Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-06 19:37:06

No Duplicates.

Comment 102 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Matthew
Last Name: Marichiba
Email Address: matthew@marichiba.com
Affiliation:

Subject: Auction 100% of permits, use cap-and-dividend, add carbon fees for fossil fuel companies
Comment:

```
Dear CARB,

This work makes me proud to be a Californian. Thank you for your
work on the Draft AB32 Scoping Plan to reduce California's GHGs by
2020, especially in setting goals for the State to increase
renewable energy and reduce vehicle miles travelled.

Please consider these recommendations for inclusion in the Final
Scoping Plan:
* The State should auction 100% of permits under the cap.
Polluters should pay for their emissions, not be given free
permits that subsidize coal and prolong the transition to cleaner
energy.
* The Scoping Plan should specify that all auction revenues will
be used to provide a Dividend to compensate consumers.  With
gasoline at $4.50/gallon and rising electricity prices, helping
consumers deal with fuel and electricity costs is the best use of
auction revenues.
* I support CARB's proposal for Carbon Fees on fossil fuel
companies to help fund CARB's implementation of AB32. Carbon Fees
can also provide funding sources for clean technologies, green
jobs, energy efficiency programs, and more.

Sincerely,

Matthew Marichiba
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-08 12:54:09

No Duplicates.

Comment 103 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Chris
Last Name: Bellizzi
Email Address: Chris13b@ix.netcom.com
Affiliation: Bellizzi Tree Service

Subject: AB 32 Implementation
Comment:

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Please see attachment
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/107-carb_workshop.doc

Original File Name: Carb workshop.doc

Date and Time Comment Was Submitted: 2008-08-09 18:45:27

No Duplicates.

Comment 104 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Chris
Last Name: Bellizzi
Email Address: Chris13b@ix.netcom.com
Affiliation: Bellizzi Tree Service

Subject: Comments that weren't spoken in San Jose workshop
Comment:

Good Morning Members of CARB,
I participate in these preceedings with high hopes that the democratic process will work, but I realize being the pragmatist I am that any positive work done will be subverted by well funded lobbyists of the powerful petrolueum producers.
My 30+ years of Rock Climbing and being an Outdoor Enthusiast has had me in sections of the California's Sierra's where there is evidence of Global Warming. My fist hand experience has raised my moral imperative to step out of my "comfort zone" to help remedy the situation.
I have been an environmentalist since age 10 and as such have developed a strong love of our Planet Earth and the people who populate it.
When time came for a career path I took my love of climb rocks to love of climbing trees and Bellizzi Tree Service was formed in 1983.Currently we are the only "green" Tree Service in Silicon Valley.45% of our fuel is 100% Renewable Bio-Diesel. I drive a Bio-Diesel bug that gets 52 MPG and my wife drives a Prius. Our combined CO2 out put is about 10,000 pound per year about ¼ th of the average Californian.
You may be wondering where this all going. I think I have a unique perspective being an Environmentalist, Businessman, Consumer and a Solar Powered homeowner in Saratoga California. Every issue that confronts California confronts me in micro.
The issues that CARB need to address are wide ranging and complex.
I would like to see a larger percentage of renewable energy for the Renewable Portfolio Standard.
I would like to see the ZEV requirement for production percentages of new vehicles reinstated.
I believe our reduction in GHG will come thru a mix of conservation, efficiency, PHEVS, EVS and high efficiency Bio-Diesel Vehicles.
I would like the Low Carbon Fuel Standard issued.
I would like to see an immediate carbon tax on all regular diesel with a corresponding rebate for locally produced Bio-Diesel thru CARBS emergency action order. In my opinion it is repugnant that people who try and do better by the environment are penalized a higher price per gallon while dirty Regular diesel gets cheaper and cheaper.
I would like to see the importers of the largest industry segment of GHG emissions held to higher standards while the cost of transition to low carbon society not be borne by sectors of the economy that can ill afford the transition or

litigation.
I would like to see a clean cars feebate for hybrid that also included cars that are purchased locally and running 100% Bio-Diesel and get 40-52 miles per gallon , not ship across the ocean in ships burning bunker diesel fuel.
I would like CARB to factor total life cycle in their Clean Car Rebates, with the fact that places around the world are strip mined for Nickle-Cadnium or Lithium Ion Batteries
I believe CARB likes the direction the country Germany is going as leader in Solar Photovoltaic and Wind, but yet they do not embrace the fact Germany has a Bio-Diesel mandatory mix of diesel fuel of B10.
For the lay people, that means they only pay for 80% imports and make 10% of their Bio-Diesel locally. They also drive many Turbo Diesel Injected vehicles that typically on the highway outperform Hybrids.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-09 18:51:12

No Duplicates.

Comment 105 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Patrick
Last Name: Griffith
Email Address: pgriffith@lacsd.org
Affiliation: Los Angeles County Sanitation Districts

Subject: LACSD Comments on the AB 32 Program Design
Comment:

The following are our detailed comments on the Cap and Trade discussion in the Draft Scoping Plan and Appendicies, and other related topics:

1. Many stationary sources in California are already at BACT or BARCT levels and little room remains to do better. In SCAQMD's 2007 AQMP, for example, Multiple Component Sources Control Measure MCS-01 will move most combustion sources in the South Coast Air Basin from BARCT to BACT during the 2010-2023 timeframe. Hence there will be very little opportunity for further in-plant emissions reductions given that BACT is the best that can be done. Most stationary sources therefore, very early into the Scoping Plan regulatory cycle, will be forced to rely heavily on offsets to meet declining caps under a cap-and-trade (C&T) program. The use of offsets will be critical to survive the early stages of a C&T environment. These offsets must not be arbitrarily limited either numerically or geographically.

2. Implementation should start slowly, akin to putting one's big toe into a tub of hot water before jumping in, so as not to cause irreversible effects by a rush to action. No justification has been offered for the need to "quickly transition" (Page 18) from a system where the state provides some free allowances to a system where the majority of the allowances are auctioned in the trading market. This is especially true if an auction system is implemented. At the outset of a program this large and with such potential financial impacts, only a small amount of allocations should be auctioned initially and then gradually increased until the regulators and the regulated entities become acclimated, and the market matures.

3. Superposing C & T atop command and control rules for the same source categories could increase the overall program cost. Command and control strategies should be used as backstops, to be phased in only if C & T doesn't achieve the required targets within a specific period of time.

4. Preliminary Recommendations, Part B, Section 1, Cap and Trade Program, Pages 15-20: Although the Draft discusses on how the cap and trade system would work, there is little discussion on the advantages the program would bring. We realize that ARB is under

pressures to opt for a carbon tax instead or command and control regulation. To better support cap and trade, the ARB should expand its arguments beyond those mentioned briefly on p. 19 in the Scoping Plan text. These advantages include:

o Causes less economic disruption than direct regulation or carbon taxes
o Clear incentive for over-performance
o Strong driver for technological innovation to achieve that over - compliance
o Can stimulate emissions reductions in non-covered sectors
o Achieve emissions certainty – ensures that the targets are met
o Widely accepted
o Guarantees that the covered sectors pay for their emissions
o Still retains many regulatory aspects such as permits for emissions, verification and penalties for non-compliance

ARB should also make mention of the success of the EU-ETS, specifically pointing out that emissions reductions from this program are expected to exceed 200 million metric tons of CO2 per year – equivalent to erasing ALL of California's transportation emissions. Bear in mind that the EU program faced many structural hurdles including getting cooperation from over 20 countries with different cultures and languages. If the EU could overcome those obstacles to effect real and significant emissions reductions, there is no reason why California can't do better.

An effective cap and trade system is the only market mechanism considered that will encourage the technology development needed to take California past its 2020 goals and onto 2050. We ask that the state more clearly spell out the advantages of this program if only to better support its own efforts.

5. Page 18: Regardless of their status in the inventories resulting from the mandatory reporting rule, essential public services such as schools, hospitals, sanitation, LFG systems, police, fire, etc., should not be included in C&T programs. Taxpayers should not be indirect speculators in the marketplace and be held hostage to market whims. In the event that local governments own facilities that are captured under C&T, with the exception of municipal utilities, they should be given free allocations. This avoids unnecessary competition between government and the business community. Local governments, competing for allocations, only raise the cost of the allocations for everyone.

6. Page 19: The limit on offsets is without basis and counter-productive to the larger goal of emissions reduction. Certainly, at a minimum, there should be no limit on offsets generated within the WCI as these would most likely meet the most stringent standards of verifiability, additionality, etc. To place a cap on offsets will restrict innovation and place a further burden on all businesses in the WCI.

7. Preliminary Recommendations, Section C, Carbon Fees, Page 41: Carbon fees should target strictly anthropogenic emissions from fossil fuel combustion and exclude biogenic CO2 emissions from carbon-neutral fuels like landfill gas and sewage or manure based digester gas. This treatment recognizes that the carbon-neutral fuels add no new carbon to the atmosphere but rather complete the natural, short-term carbon cycle of atmosphere-plant-human and

back to atmosphere. Moreover, proceeds of carbon fees should only be spent to further reduce GHGs.

8. Preliminary Recommendations, Section C-3, Compliance Offsets, Page 43: A lot of emissions reductions opportunities will be forgone if we have to wait for the rigorous protocols called for under the “Compliance Offsets” paragraph. Perhaps certain well-documented projects could get categorical or pre-approvals to fast-track emissions reductions. We ask that ARB find a way to expedite the approval of offset projects so that emissions reductions can occur now, when they are most needed.

9. Preliminary Recommendations, Section C-3, Voluntary Offsets, Page 45: ARB should do more than issue a supportive policy statement encouraging early reductions of GHG emissions. Such actions need recognition and protection against potential federal actions that might re-draw the baseline or not recognize state programs. Better support and protection would stimulate more voluntary reductions.

10. Preliminary Recommendations, Section C-4, Use of Possible Revenues, Page 47, Direct emission reductions: ARB should purchase CO2 reductions or allowances for the sole purpose of retirement only as a last resort. It is hard to justify taxpayer money for this purpose as long as the state continues to face mounting deficits and other critical needs are underfunded. Any excess monies should fund emissions reductions projects and technologies.

11. Page C-12: New facilities that begin operation in sectors included in a cap-and-trade program should NOT need to purchase allowances either through an auction or from other allowance holders. This is akin to South Coast’s RECLAIM “structural buyers” provision that, in our opinion, is fundamentally unfair to new entrants into the regulatory program. A permanent set aside or bank of allocations should be funded by CARB to allow new businesses to be covered in the same fashion as the original entrants to the program. Without such a provision, new business development is discouraged. Earlier versions of the Lieberman-Warner bill had such protective provisions.

12. Page C-12: It is unclear how the cap-and-trade program will cover 85% of California’s emission sources by 2020. Please provide a chart showing how sources will fall under C&T with time. The time-weighted average of emissions under the C&T program seems much less than 85%.

13. Page C-15: ARB may be adopting regulations to implement cap and trade well before the other members of the WCI have implemented inventory programs. The European experience in Phase I of their EU-ETS has shown how dangerous it is to implement cap and trade without having a reliable emissions estimate. We suggest that the cap and trade program be voluntary until the other parties in the WCI are ready to fully participate to minimize the potential for market disruptions.

14. Page C-17: The draft recommendation for the WCI calls for allowance auctions in the first year to constitute between 25 to 75 percent of the total cap. We feel that even the 25% number is too high and will cause significant economic hardship. We urge

the ARB to consider carefully the economic duress that may be created if too high an auction percentage is chosen, or if free allowances are too rapidly phased out.

15. Page C-18: Exactly how will the auction process encourage voluntary early reductions by firms, municipalities and individual consumers? Free allowances should be distributed to entities that undertake early actions. More importantly (see our general comments) CARB must actively protect California early actions under a federal climate change program.

16. Page C-19: As we stated in our general comments, we do not understand how the ARB can say with certainty that allowing offsets outside of California would reduce co-benefits inside California. It is difficult to envision the type of projects that would be offered up as offsets, and therefore this conclusion seems speculative to us. Take for example, the application of biosolids-derived compost from California on agricultural land in Arizona. This project could generate offsets by reducing nitrous oxide emissions relative to the use of commercial fertilizer and increased carbon retention in the soil. Any co-benefits analysis would include too many variables (tillage and irrigations practices, crop choice, soil conditions, etc.) to say for certain that compost application in California is to be preferred over that in Arizona. ARB should not debit or otherwise discourage offsets outside of California unless the co-benefits are clear and overwhelming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-11 14:02:44

No Duplicates.

Comment 106 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Shankar
Last Name: Prasad
Email Address: shankar@coalitionforcleanair.org
Affiliation: Coalition for Clean Air

Subject: Comments on the Draft Scoping Plan
Comment:

```
The Coaliton for Celan Air submits its comments for considereation
in revising the Draft Plan by the CARB staff.

Shankar Prasad, M.B.B.S
Executive Fellow
Coalition for Clean Air
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Attachment: www.arb.ca.gov/lists/sp-design-ws/110-scopingplancomments1.doc

Original File Name: ScopingPlanComments1.doc

Date and Time Comment Was Submitted: 2008-08-11 14:32:53

No Duplicates.

Comment 107 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Pat
Last Name: O'Brien
Email Address: cseghers@arb.ca.gov
Affiliation: East Bay Regional Park District

Subject: Climate Change Scoping Plan
Comment:

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Please see attached letter
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Attachment: www.arb.ca.gov/lists/sp-design-ws/111-7_30_08_patobrien.pdf

Original File Name: 7_30_08_patobrien.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:21:13

No Duplicates.

Comment 108 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Bruce
Last Name: McLaughlin
Email Address: mclaughlin@braunlegal.com
Affiliation: CMUA

Subject: California Municipal Utilities Association Comments on the Draft Scoping Plan Appendix C
Comment:

```
Please find attached CMUA's Comments on the Draft Scoping Plan
Appendix C.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/112-cmua_comments_on_the_draft_scoping_plan_appendix_c.pdf

Original File Name: CMUA Comments on the Draft Scoping Plan Appendix C.pdf

Date and Time Comment Was Submitted: 2008-08-11 16:09:36

No Duplicates.

Comment 109 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Taylor
Last Name: Miller
Email Address: TMiller@sempra.com
Affiliation:

Subject: Scoping Plan Appendices 8-11-08
Comment:

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Sempra Energy Scoping Plan Appendices 8-11-08
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Attachment: www.arb.ca.gov/lists/sp-design-ws/113-secomments_8-11-08.pdf

Original File Name: SEComments 8-11-08.pdf

Date and Time Comment Was Submitted: 2008-08-11 16:39:54

No Duplicates.

Comment 110 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Andrew
Last Name: McAllister
Email Address: andrew.mcallister@energycenter.org
Affiliation: California Center for Sustainable Energy

Subject: Comments of the California Center for Sustainable Energy
Comment:

```
Attached please find Comments of the California Center for
Sustainable Energy (CCSE) Regarding the Climate Change Draft
Scoping Plan (June 2008 Discussion Draft and Appendices).
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/114-080811_ccse_arb_scoping_plan_comments_final.pdf

Original File Name: 080811_CCSE ARB Scoping Plan Comments_Final.pdf

Date and Time Comment Was Submitted: 2008-08-11 18:35:33

No Duplicates.

Comment 111 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Clare
Last Name: Breidenich
Email Address: clare@wptf.org
Affiliation: Western Power Trading Forum

Subject: WPTF Comments on ARB Draft Scoping Plan
Comment:

```
Attached please find comments of the Western Power Trading Forum on
the Climate Change Draft Scoping Plan and Appendices.

Regards,
Clare Breidenich
GHG Consultant
Western Power Trading Forum
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/115-08-11-08_wptf_comments_on_arb_scoping_plan-_final.pdf

Original File Name: 08-11-08 WPTF Comments on ARB Scoping Plan- Final.pdf

Date and Time Comment Was Submitted: 2008-08-11 20:05:14

No Duplicates.

Comment 112 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Derek
Last Name: Walker
Email Address: dbwalker@edf.org
Affiliation: Environmental Defense Fund

Subject: EDF - Program Design comments
Comment:

```
Please accept the attached Program Design comments from
Environmental Defense Fund on the AB 32 draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/116-edf_-_program_design_comments.pdf

Original File Name: EDF - Program Design comments.pdf

Date and Time Comment Was Submitted: 2008-08-12 15:02:09

No Duplicates.

Comment 113 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Michelle
Last Name: Passero
Email Address: MPassero@tnc.org
Affiliation:

Subject: TNC Draft Scoping Plan Comments
Comment:

```
Attached are The Nature Conservancy's comments for the Draft
Scoping Plan.

Thank you,

Michelle
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/117-tnc_draft_scoping_plan_comments_final__8_13_08.pdf

Original File Name: TNC Draft Scoping Plan Comments Final 8 13 08.pdf

Date and Time Comment Was Submitted: 2008-08-13 13:49:16

No Duplicates.

Comment 114 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: John
Last Name: Canfield
Email Address: jcanfield@ebay.com
Affiliation:

Subject: Cap and Dividend: a political necessity as energy prices rise
Comment:

To Chairman Nichols and the ARB Staff:

Congratulations on a very comprehensive and thoughtful AB32 Draft Scoping Plan. ARB is in a unique position to establish innovative, effective, and just climate change regulations that can be used as a model for national and global regulation. Thank you for establishing an open and transparent process for this important work.

Please accept the following requests regarding the design of the cap-and-trade mechanism.

1) The draft plan is to be commended for including the vast majority of GHG-emitting sectors in the cap, and I encourage you phase in the largest sector (transportation fuel) as close to 2012 as possible.

2) 100% auction should be the program design from the beginning. Having the polluters pay for all of their emissions is the fairest, and also the simplest. Opening the door to free allowances will create a lobbying frenzy and a huge distraction from more important environmental work.

3) A monthly dividend should be the primary use for auction revenue. A recent CBO study showed that lump-sum dividends are the only approach that avoids regressive impact to the 40% lowest-income residents. Also, as gas and energy prices increase, a steadily increasing dividend sent to all residents may be the only politically viable way to keep public support behind climate change measures. With cap-and-dividend, every resident has the opportunity to profit if they reduce their carbon footprint.

I hope that we will all look back at California's AB32 implementation as an key step in the global fight to prevent climate change. Thanks for your leadership.

Best regards,

John Canfield
Member, Climate Protection Campaign
Sr. Director, Trust & Safety Policy Management, eBay
(these comments represent my own opinions, and not that of my employer)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-13 23:08:31

No Duplicates.

Comment 115 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Cathy
Last Name: Karlstad
Email Address: Cathy.Karlstad@sce.com
Affiliation: Southern California Edison

Subject: Southern California Edison's Comments on Draft Scoping Plan Appendices
Comment:

```
Attached are SCE's comments on the Draft Scoping Plan Appendices.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/119-sce_comments_on_draft_scoping_plan_appendices.pdf

Original File Name: SCE Comments on Draft Scoping Plan Appendices.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:39:28

No Duplicates.

Comment 116 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Audra
Last Name: Hartmann
Email Address: audra.hartmann@dynegy.com
Affiliation: Dynegy

Subject: Comments on Climate Change Draft Scoping Plan and Appendices
Comment:

```
Attached please find the comments of Dynegy Moss Landing LLC,
Dynegy Morro Bay LLC, Dynegy South Bay LLC, Dynegy Oakland LLC
(Dynegy)on the above referenced matter
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/120-dynegy_climate_change_comments.pdf

Original File Name: Dynegy Climate Change Comments.pdf

Date and Time Comment Was Submitted: 2008-08-14 12:19:28

No Duplicates.

Comment 117 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

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

Subject: CAPCOA Comments on Scoping Plan
Comment:

```
CAPCOA Comment letter on the Scoping Plan signed by Barbara Lee,
President.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/121-capcoa_comments_on_scoping_plan_8-15-08.pdf

Original File Name: CAPCOA Comments on Scoping Plan 8-15-08.pdf

Date and Time Comment Was Submitted: 2008-08-18 08:25:03

No Duplicates.

Comment 118 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Ed
Last Name: Pike
Email Address: ed@theicct.org
Affiliation: The ICCT

Subject: regionally coordinated transportation GHG reduction incentives
Comment:

```
The International Council on Clean Transportation recommends a
regionally coordinated program on auctioning allowances, and
investing in GHG reductions in the transport sector and others.
We recommend that CARB work with WCI to achieve this goal.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/125-icct_letter_to_wci_8-13-08.pdf

Original File Name: ICCT letter to WCI 8-13-08.pdf

Date and Time Comment Was Submitted: 2008-08-28 15:29:44

No Duplicates.

Comment 119 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Ronald
Last Name: Mitchell
Email Address: rmitchel@uoregon.edu
Affiliation: University of Oregon

Subject: Evaluating Effectiveness of Strategies Included
Comment:

```
Please see attached file with comments on "Evaluating Effectiveness
of Strategies Included in the AB 32 Draft Scoping Plan"
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/127-carb_scopingplancomments.pdf

Original File Name: CARB_ScopingPlanComments.pdf

Date and Time Comment Was Submitted: 2008-09-02 15:56:22

No Duplicates.

Comment 120 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Alexander
Last Name: Pugh
Email Address: apugh@lachamber.com
Affiliation: Los Angeles Area Chamber of Commerce

Subject: Los Angeles Area Chamber of Commerce Scoping Plan Comments
Comment:

```
To Whom it May Concern:

I would like to submit the following comments on the AB 32 scoping
plan on behalf of the Los Angeles Area Chamber of Commerce.  I look
forward to working with CARB on the final format of this plan.

Thank you,
Alexander Pugh
Senior Public Policy Manager
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/151-092008ab32positions.pdf

Original File Name: 092008AB32positions.pdf

Date and Time Comment Was Submitted: 2008-09-19 18:12:54

No Duplicates.

Comment 121 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Michelle
Last Name: Newman
Email Address: hodah_18@yahoo.com
Affiliation:

Subject: AB32 Implementation
Comment:

To be sure that implementation of AB 32 is just, fair, and effective, I urge the Air Resources Board to embrace the following elements in its final Scoping Plan and in any collaboration between California and the Western Climate Initiative:

1. Ensure that any plan to distribute carbon emission allowances and revenues is done in a fair and equitable manner.

2. Auction 100% of the allowances and designate revenues to assist low-income people in adapting to AB 32 through energy efficiency programs, transportation alternatives, and bill payment assistance. Funds should also be used for green jobs training and clean energy investments. I do not support free giveaways of allowances. Polluters should pay the full cost.

4. Ensure that working people can transition to new green jobs, and that worker retraining is available for that purpose.

5. Given that the Draft Scoping Plan includes working with the Western Climate Initiative partners on a cap-and-trade program, ensure that the WCI's scope includes transportation fuels in order to maintain the environmental integrity of WCI and to achieve the lowest cost economy-wide emissions reductions.

Thank you, Michelle Newman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-23 01:21:00

No Duplicates.

Comment 122 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: louis
Last Name: blumberg
Email Address: lblumberg@tnc.org
Affiliation: the Nature Conservancy

Subject: international forest projects in cap and trade
Comment:

```
see attached coalition letter
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/160-intl_forest_offsets_carb_letter_final.doc

Original File Name: Intl forest offsets CARB letter final.doc

Date and Time Comment Was Submitted: 2008-09-26 11:10:28

No Duplicates.

Comment 123 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Mike
Last Name: Mielke
Email Address: mmielke@svlg.net
Affiliation: Silicon Valley Leadership Group

Subject: Early Development of Cap-and-trade System that Aligns with WCI Market System
Comment:

```
Attached, please find a letter from the Silicon Valley Leadership
Group calling for early development of a cap-and-trade System that
closely agrees with the Western Climate Initiative market system
design.
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/168-final_silicon_valley_ab_32_comments_letter_--_early___complete_impelmentation_of_market_system___integration_with_wci.pdf

Original File Name: Final Silicon Valley AB 32 Comments Letter -- Early & Complete Impelmentation of Market System & Integration with WCI.pdf

Date and Time Comment Was Submitted: 2008-10-01 16:24:32

No Duplicates.

Comment 124 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Robert
Last Name: Finkelstein
Email Address: bfinkelstein@turn.org
Affiliation: The Utility Reform Network (TURN)

Subject: Carbon fees over cap & trade, and no offsets
Comment:

The Utility Reform Network (TURN) is a state-wide consumer advocacy organization that advocates on behalf of California's residential and small business customers of the state's investor-owned energy utilities (PG&E, Southern California Edison, SDG&E and Southern California Gas).

TURN comments on two topics -- the advantages of carbon fees over a cap and trade mechanism as the more effective and efficient mechanism for achieving the goals of AB 32, and the need to prohibit the use of offsets to achieve compliance.

-- Carbon Fees Should Be Adopted, Not “Cap and Trade”

TURN has read and considered the comments of Laurie Williams and Allan Zabel in support of carbon fees rather than a cap and trade system, presented to CARB earlier in the process. (Their comments may be found at http://www.arb.ca.gov/lispub/comm2/bccomdisp.php?listname=sp-design-ws&comment_num=45&virt_num=42.)
Rather than simply re-state the compelling logic presented in those comments, TURN incorporates them by reference and endorses them without reservation.

TURN's experience with "market-based" structures intended to achieve expected outcomes leaves us very skeptical of the premise that a cap-and-trade system would work as intended. Perhaps more importantly, such efforts to rely on market forces rather than regulation (such as the imposition of a carbon fee) tend to create unintended consequences that might not only undermine the intended goal, but create substantial disruption on their own. In the mid- to late-1990s, California congratulated itself for its successful transition from regulation to reliance on market forces for the development and operation of electric generation facilities. But from June of 2000 through January of 2001, that experiment flamed out in spectacular fashion, creating rolling black-out conditions (even though there was ample generation supply) and unexplained price increases for generation supply, and bringing the state's two largest electric utilities to their knees (with one going so far as to declare bankruptcy). The immediate solution implemented in 2001? A return to regulation, albeit with new constraints that produced far higher prices for California consumers than they'd faced previously. Whatever arguments that might continue about the unanticipated cause of the generation market melt-down and the various solutions pursued to bring some semblance of stability back to that market, there can be no dispute that the "market-based"

approach that the vast majority of commenters had labeled as "innovative" when it was first adopted back-fired in a huge way and, in doing so, left California further from its original goal and paying more for the privilege of having survived the failure.

If CARB needs further evidence of the cause for concern, it need only look at newspaper headlines for the past few weeks. The deregulation in financial services markets was touted as likely to produce innovative products that would better serve the U.S. economy. Now we are on the brink of seeing a $700 billion bail-out package approved, as huge financial institutions teeter and fall on a nearly daily basis. TURN suspects that various experts will float many explanations of the causes of the current economic chaos and critiques of the various solutions, both adopted and rejected. But it would seem that one point is indisputable -- when the nation's policy-makers substituted "market" forces for regulation in order to achieve their goals, they never anticipated the outcome that they unwittingly unleashed.

TURN submits that CARB's first step should be to design and implement a carbon fee, thus providing the incentive to spur investment in clean energy sources that do not rely on fossil fuels, while minimizing the likelihood of producing unintended consequences.

-- Offsets Should Not Be A Means of Compliance

CARB should reject any reliance on offsets as a means of achieving compliance with greenhouse gas reduction requirements. TURN is extremely concerned that offsets will both undermine real emissions reductions and will reduce the potential benefits of reducing co-pollutant emissions due to carbon emissions reductions.

The history of the RECLAIM program illustrates that a trading scheme with offsets can actually hinder emissions reductions. The problems caused by the initial overallocation of allowances are well-documented in the record. Generators purchased questionable offsets in the form of abandoned cars instead of installing emissions control technologies. Moreover, after the astronomical jump in RECLAIM allowance prices in 2000 due to the energy market meltdown, the generators were exempted from the RECLAIM trading system and forced to install scrubbers. Essentially, most of the emission reductions benefits of RECLAIM occurred due to a suspension and renunciation of the cap and trade system.

Thank you for your consideration of these comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-02 16:54:05

No Duplicates.

Comment 125 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Stephen
Last Name: Maguin
Email Address: cseghers@arb.ca.gov
Affiliation: County Sanitation Districts of LA County

Subject: Essential Services in cap and trade Programs Under AB 32
Comment:

```
Please see attached comment
```

Attachment: www.arb.ca.gov/lists/sp-design-ws/171-9_22_08_losangelescountysanitationdistricts.pdf

Original File Name: 9_22_08_LosAngelesCountySanitationDistricts.pdf

Date and Time Comment Was Submitted: 2008-10-03 13:17:17

No Duplicates.

Comment 126 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Jay
Last Name: Kinnear
Email Address: jlarba@gmail.com
Affiliation: concerned citizen

Subject: AB 32 and agriculture water
Comment:

```
I am gravely concerned that AB 32 does not address the use of
California water by the agricultural industry.  Yes, they need
water, but free flowing water is not sustainable nor prudent.

Please modify this very thoughtful and comprehensive bill, AB 32,
to address the use of water in the state, especially as it
pertains to agriculture.

We can no longer afford to have precious fresh water used to
freely irrigate desert land without consideration for it's actual
cost and reuse.

thank you,
Jay Kinnear
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-04 13:47:11

No Duplicates.

Comment 127 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Jay
Last Name: Kinnear
Email Address: jlarba@gmail.com
Affiliation: concerned citizen

Subject: Program Design for Agriculture Water
Comment:

```
To Whom It May Concern:

Currently, AB 32 does not have any program design, and therefore
no enforcement, for water use by the Agriculture Industry.

Given the scope of AB 32 it is necessary for water use, water
management, and enforcement to be incorporated in to the program.
Agriculture is the largest use of water in the state  and thorough
analysis has proved that free-flowing use of fresh water by a
single industry has greatly endangered wildlife and fish to
co-exist in our great state.

Also, it is a known fact that when costs increase, industries
become innovative and creative, thereby, enabling the development
of new technologies to off-set cost increases of materials (in
this case, the natural resource of water)!

Thank you for your consideration.

Sincerely,
Jay Kinnear
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-04 14:38:27

No Duplicates.

Comment 128 for Design Comments for the GHG Scoping Plan (sp-design-ws) - 1st Workshop.

First Name: Marina
Last Name: Rose
Email Address: marinarose@gmail.com
Affiliation:

Subject: AB 32
Comment:

```
How can we have a global warming Solutions Act in California
without addressing water? Water will be the number one problem of
global warming in CA since we live in a desert.

Please include WATER in the solutions to global warming in CA
AB32.

Thank you,

Marina Rose
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-13 09:22:57

No Duplicates.

There are no comments posted to Design Comments for the GHG Scoping Plan (sp-design-ws) that were presented during the Workshop at this time.