

**Comment 1 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Chris

Last Name: Morgner

Email Address: ckjmorg@aol.com

Affiliation: California agriculture businessman

Subject: ARB News Release June 26, 2008

Comment:

Utilities are to provide 33% of their power from renewable resources such as wind, solar, and geothermal? Since I know you are not joking (and it really isn't funny), I'd like to know how long that will take and at what cost. There was no mention of nuclear power which would be an abundant source of clean energy at lower cost and in a shorter time frame than wind and solar. I am totally against the far reaching extremes that AB32 demands.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-28 16:37:26

No Duplicates.

## **Comment 2 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: jack  
Last Name: osborne  
Email Address: jho@sonic.net  
Affiliation:

Subject: report accuracy  
Comment:

you see an example of a problem with all "expert" testimony: most of it is "MAI", made as instructed. I've read many tax opinions by large law firms used to promote various tax shelters that I couldn't have signed. Not even for the \$500,000 I guessed the law firm got for the opinion. For \$5 million, well ... The problem is a general lack of "expert" accountability, whether the "experts" are: CPAs, rating agencies, criminalists, FBI agents, economists, you name it. If you can't sue 'em over their opinions, they're worthless. If they can hide behind lawyer-client privilege, they're worthless.

And that is accurate for all policies that are generated to comply with a requested solution.

There are no rebuttal arguments, contrary opinions, or anything that might upset the required solution., especially when it involves politics or politicians.

Like most things produced on this subject it is biased one way, or the other, depending on the desires of the requestors of the opinions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-29 12:49:17

No Duplicates.

### **Comment 3 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: robert  
Last Name: dinwiddie  
Email Address: bobdin123@sbcglobal.net  
Affiliation:

Subject: arb plan to reduce green house gases  
Comment:

Please do nothing to create more expense and problems for californa busniness and citizens. There are 31000 plus weather and atmospheric scientists that say man does not cause global warming or climate change. You can cause this state immeasurable damage if you keep up this foolishness in gas and diesel requirements. Worse yet. if you increase the requirements on oil and utility companies to reduce carbon sources of fuel, the people of californa will pay dearly for an unproven warming theory...for the last 10 years we have cooled..please, dear God, let there be common sense used. If you continue your stated path, you will all be personally responsible for destroying the economy of Califonia. Since we can't make it rain make it stop make the skys snow, stop or start hurricanes, how in God's name do you think we can cause the climate to warm or cool????

Hopefully you will hear from all us other silent citizens telling you to stop fooling with our lives and back off on your power trip. sincerely. R Dinwiddie

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-29 14:44:59

No Duplicates.

**Comment 4 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kimberly Anne  
Last Name: Halizak  
Email Address: ttiot@hotmail.com  
Affiliation:

Subject: CA Global Warming Solutions Act (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.

Kim Halizak  
1933 N. Beachwood Dr., #205  
Los Angeles, CA 90068

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-30 16:51:12

2 Duplicates.

**Comment 5 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Beverly

Last Name: Huff

Email Address: bevhuff@cox.net

Affiliation:

Subject: Not far enough

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.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-30 20:04:01

No Duplicates.

## **Comment 6 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Robert

Last Name: Kurz

Email Address: rkurz@hotmail.com

Affiliation:

Subject: Draft Scoping Plan

Comment:

I wish to thank 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 all your hard work on this vitally important project.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 06:32:58

No Duplicates.

## **Comment 7 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Dan

Last Name: Esposito

Email Address: danjesposito@yahoo.com

Affiliation:

Subject: Some Thoughts, Thank You for Listening!

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.

Dan Esposito  
1711 Axenty Way  
Redondo Beach, CA 90278

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 08:19:31

No Duplicates.

**Comment 8 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: James

Last Name: Mayeau

Email Address: domaye77542@peoplepc.com

Affiliation:

Subject: Passing a bull against the comet

Comment:

You have to be kidding. Not just the public, but you have to be kidding yourselves. The sheer hubrus believeing that legislators can regulate the weather confirms the wisdom of term limits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 10:06:14

No Duplicates.

## **Comment 9 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jan  
Last Name: Snedegar  
Email Address: jansnedegar@cox.net  
Affiliation:

Subject: CARB  
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.

Jan Snedegar  
31151 Ceanothus Drive  
Laguna Beach, CA 92651

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 13:26:23

No Duplicates.

**Comment 10 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ricky  
Last Name: Grubb  
Email Address: nobodyslaw@yahoo.com  
Affiliation: Sierra club

Subject: Zero emissions vehicles  
Comment:

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

I am saddened at the decision to rollback requirements for zero emissions vehicles though.

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.

Ricky Grubb. environmentalrep@stnc.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 22:20:54

No Duplicates.

## **Comment 11 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Allegra

Last Name: Azus

Email Address: allegraa@gmail.com

Affiliation:

Subject: ...

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.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 23:17:01

No Duplicates.

## **Comment 12 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Ellen

Last Name: Koivisto

Email Address: offstage@earthlink.net

Affiliation:

Subject: more

Comment:

All these plans are literally a drop in the ocean. More needs to be done, more drastic action needs to be taken, and things need to happen a lot faster. The planet is at stake here, not in some indefinite future but now and we need to act drastically now or we'll all suffer, except those who die from it -- like 90% of all species, like millions of humans, like the biosphere of the planet.

We need to drastically reduce CO2, methane and water vapor production. We need to treat cars the same as cigarettes, only more lethal to a greater number of people over time and with greater costs to society. We need to phase out gasoline use, coal use, and nuclear power. We need to ramp into place alternative energy sources that do not produce CO2 (hence, biofuels are just a different problem, not a solution). We need massive government funding for wind, solar, other alternative and reductive strategies. We need a huge recycling effort. We need to be on a footing similar to that during WW II, only the need is more pressing and the ultimate costs of losing this battle infinitely greater.

And we need to do all this NOW.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 09:18:30

No Duplicates.

## **Comment 13 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: D.

Last Name: Robinson

Email Address: dee\_1234@prodigy.net

Affiliation: Sierra Club

Subject: Keep polluters accountable and protect our air

Comment:

We agree with the comments below submitted by the Sierra Club and agree that we must thank CARB for it's work to create a clean-energy in it's plan that calls for 33% of our electricity to come from renewable sources.

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 the CARB 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.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 10:39:36

No Duplicates.

**Comment 14 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Stephanie  
Last Name: Adams  
Email Address: mejaneanthro@aol.com  
Affiliation: Sierra Club

Subject: CARB draft scoping plan  
Comment:

Many thanks to the California Air Resources Board for your work to create a clean-energy future. I appreciate that your plan calls for 33% of our electricity to come from renewable sources. 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. The following steps would keep polluters accountable and protect our air: CARB's plan needs to call for strict greenhouse gas pollution reductions; and fully addressing the need to limit offsets and analyze the impacts of a cap-and-trade system on air quality in our most polluted communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 11:11:43

No Duplicates.

**Comment 15 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Linda

Last Name: Nicholas

Email Address: linda@lindanicholas.com

Affiliation:

Subject: CARB warming plans

Comment:

Let's make some changes! Go for the stringent!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 11:26:39

No Duplicates.

**Comment 16 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Evan

Last Name: Jones

Email Address: revwin@yahoo.com

Affiliation:

Subject: Effect of population growth on GHG

Comment:

Over the next 12 years (pursuant to AB 32), the population of California will grow, from births alone, by over 20%, an increase equal to the present population of Los Angeles. Thus, population growth threatens to defeat goals to reduce GHG by the targeted 30%.

Total GHG = (per capita release of GHG) X (population)

We must not ignore the importance of population growth. If we concentrate only on per capita release of GHG, our efforts will be doomed to failure. Education, family planning facilities, and other efforts to stabilize population must become part of the mix to reach our goal in reducing GHG.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 15:40:32

No Duplicates.

**Comment 17 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Celia  
Last Name: Kutcher  
Email Address: celia552@cox.net  
Affiliation:

Subject: CARB Draft Scoping Plan  
Comment:

Thanks to CARB for setting up the new Scoping Plan to call for 33% of our electricity to come from renewable sources.

But, the plan should:

- Specifically call for auctioning of emissions permits.
  - Fully address the need to limit offsets.
  - 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.

I hope that CARB will continue to use its power to aggressively address the pollution that contributes to the rate of global warming:

- Speed the production of zero-emission vehicles.
- Shape smarter land use policies.
- Boost recycling rates.
- Strengthen public transit policies.
- Institute strong zero-waste policies.

Respectfully,

Celia Kutcher

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 17:44:07

No Duplicates.

## **Comment 18 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Alicia  
Last Name: Kern  
Email Address: aliciajkern@yahoo.com  
Affiliation:

Subject: Reduce Greenhouse Gases  
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.

Alicia Kern  
27225 Sunnyridge Road  
Palos Verdes Peninsula, CA 90274

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-02 22:10:02

No Duplicates.

**Comment 19 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Betty

Last Name: Coppersmith

Email Address: bcoppersmith@chevron.com

Affiliation:

Subject: Appendices to Draft Scoping Plan

Comment:

The appendices referenced in the index are not included in the document. Are these still under development or are copies available? Appendices C through G are of particular interest.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-03 10:18:36

No Duplicates.

**Comment 20 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Peter

Last Name: Schmale

Email Address: pschmale@FP-ins.com

Affiliation:

Subject: Draft Recommendations for implementing AB 32

Comment:

Thank you for your work to create a clean energy future for California. We still need strong, specific measures to hold polluters accountable. Please help speed the production of zero emission vehicle and strengthen public transit. We also need to limit carbon offsets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-03 10:35:54

No Duplicates.

**Comment 21 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Randall

Last Name: Keeth

Email Address: randy19750@yahoo.com

Affiliation:

Subject: AB 32

Comment:

I just finished looking over the Executive Summary of AB 32. I was born in California in 1950, and I have taught in California public schools for almost 30 years. I am very proud of the leadership that California has shown on environmental issues, and I am excited about the implementation of AB 32. My big concern is that special interests groups may pressure you to go slow or weaken this plan. Don't do it! Stay the course and know that there are many citizens, like me, who strongly support what you are attempting to do. Thank you for your efforts!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-03 12:15:10

No Duplicates.

## **Comment 22 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: L.

Last Name: Springer

Email Address: 2239@hoc.net

Affiliation:

Subject: Comments on AB 32

Comment:

I am very concerned about the rapid increase of global warming and climate change. I insist that California's implementation of AB 32 set a strong example for the rest of the world. We need rapid and effective reductions of greenhouse gases (GHGs). I feel strongly that industries should not receive free pollution permits - polluters should have to pay for their emissions. The proceeds should go to promote clean energy. Rather than allowing polluters to buy offsets, there must be strong regulation of greenhouse gases. Muscular zero waste policies, with strong landfill and compost regulations, will also cut GHGs. I urge CARB to require that all new development meet high standards for energy efficiency. CARB should also foster policies that help to reduce auto travel. Zero Emissions Vehicles (ZEV) should be available for those that still need to travel. CARB should require that ZEVs be made available to millions of Californians.

We need to plan now for at least an 80% reduction in GHG emissions before 2050. This means that electricity production must emit zero GHGs. I urge CARB to require a 100% renewable energy portfolio for all of California's electricity - sooner rather than later.

Many of the consequences of allowing GHG's to proliferate have already started affecting California - water shortages, severe heat waves, and overwhelming forest fires. Other changes such as dramatic sea level rises, crop failures, refugee crises, spread of infectious diseases, and massive species extinctions, will be our legacy to the rest of the world if we don't take action now to curb GHG's.

L. Springer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-03 13:41:27

No Duplicates.

## **Comment 23 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Scott  
Last Name: Miller  
Email Address: millercs@roadrunner.com  
Affiliation: BioEnergy BlogRing

Subject: Challenge the Status Quo  
Comment:

NOTE: an illustrated and source-linked version of this comment is available at  
<http://bioconversion.blogspot.com/2008/07/ca-draft-scoping-plan-comment-challenge.html>

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Achieving the goals of this Climate Change Scoping Plan (an ambitious 30% reduction of greenhouse gases projected for 2020) will require major changes in the status quo fossil fuel paradigm - not only how electricity and biofuels are produced, but also the manufacture of a generation of new bioproducts based on biobased chemicals to replace fossil-based ones.

We live in the most dynamic state in the U.S. with research, manufacturing, investment capital, manpower, infrastructure, and natural resources that are the envy of the world. This combination has led to the achievement of many paradigm shifts in the past - aerospace, atomic energy, computers, software, telecommunications, biotechnology, and the internet. We are poised to develop the next paradigm in energy coupled with environmental sustainability.

However, to achieve our goals will require flexibility in our permitting standards. Currently, the choke point on energy and environmental technological deployments are held by state agencies - particularly CARB - housed in Sacramento. Our standards have become so idealistically high - i.e., Zero waste, Zero emissions - that promising technologies cannot be permitted for deployment within California. Specific examples include conversion technologies using thermochemical means that can convert municipal and environmental waste into carbon-neutral fuels and power.

The thresholds for permitting must enable promising innovations to be deployed. Without deployment most technologies will never be refined at commercial scale to approach delivering the highest standards expected by the idealists.

I recommend a graduated permitting scheme be developed by CARB for technologies of promise. Instead of comparing performance to an idealistically high set of standards, let's first compare them to the status quo. If, after deployment, the technologies cannot meet the graduated standards specified, the businesses can lose their permit to operate. But let's encourage deployment of first generation technologies in California.

Without deployment of promising technologies, the aims of this Scoping Plan will fail and the status quo will remain.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-04 10:05:31

No Duplicates.

**Comment 24 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kenny

Last Name: Stout

Email Address: kennethy69@yahoo.com

Affiliation:

Subject: Come on Americans let's use our common sense and brain

Comment:

Just quickly wanted to address the wacko people that think that the United States of America is evil, sorry to inform you guys, we have saved more people around the world and are the most giving people in the world. Oh, by the way as far as driving 55, the men and women that have died protecting "all" of our freedoms and "all" of our rights have done so so that anyone that wants to drive 55 or for that matter 45 can. But, they have also fought and died for the Americans that want to drive 70 to do so also. For anyone that wants socialism or doesn't think you deserve to have freedom, please, you have the freedom to move to Russia or Iran or where ever you choose. Use your freedom to be happy because after all the men and women that have died for all of us would expect nothing less.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-04 12:14:27

No Duplicates.

**Comment 25 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Pedro

Last Name: Macanas

Email Address: macanas\_ped@gva.es

Affiliation:

Subject: Suggestion

Comment:

I suggest the acquisition parity, this is, all the PHEV and All-Electric Vehicles have the same prices (applying the rebate from the Alternative Fuel Vehicle Incentive Program) to an equivalent all-petroleum.

Small cars would have priority (more efficiency).

Regards.

P.S.: I suggest include Smart car (microhybrid) and promote similar microhybrid electric cars (city cars).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-05 10:40:05

No Duplicates.

## **Comment 26 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Peter  
Last Name: Wilson  
Email Address: psw\_66@roadrunner.com  
Affiliation: none

Subject: Cost effectiveness of scoping plan  
Comment:

I am writing to clarify what a cost-benefit analysis of the proposed regulations should account for. There seems to be a misunderstanding in the Draft Scoping Plan about what constitutes a cost and a benefit.

\*\*\*\*\*

From the DRAFT SCOPING PLAN:

"ARB is also evaluating the potentially beneficial impacts of new job creation in the emerging "greentech" industry..." p. 53-54

"California's climate change program will generate investments in climate change emission reductions, yielding potentially vast economic benefits to California...In addition, the process of developing and deploying green technologies creates new businesses and new jobs. The savings from both reduced energy spending and the income from new jobs is channeled back into the state's economy."  
p. 54-55

\*\*\*\*\*

These statements indicate that ARB is going to count jobs and industry created to implement the new regulations as a benefit. However, in an accurate cost-benefit analysis these jobs and investment are counted as a COST, not a BENEFIT of the proposed regulations. The people of California deserve an honest accounting of the costs and benefits of the proposed regulations.

Sincerely,

Peter Wilson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-05 11:18:21

No Duplicates.

## **Comment 27 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Dennis  
Last Name: Drake  
Email Address: rockin69@cox.net  
Affiliation: Better and Better Technologies Inc

Subject: Cleaner Air and Better Fuel Mileage  
Comment:

MY 1990 Le Baron V-6 gets 50 MPG on HWY now ! We have perfected a Mini Computer that links to the Vehicles OnBoard Computer and tells it Not to Default when the engine is running too Efficient for a long time ! USMC Viet-Nam Vet  
Our HAFK Kit burns the fuel more efficiently , Has a greater flame spread , Covalizes the fuel( Gas & Diesel Versions) , Ionizes the fuel. And works on Any Gas or Diesel Engine, Any Fuel used. Giving More Power, Longer Engine Life , Way Less Pollution ! \$1,200 US for HAFK Kit Get 50% to over 300% MPG increase. More Power, Lower Pollution levels I have client with Ferrari 612 , Hummers, Posches, Mercedes Ect

And the PICC will be available by Early August ! No Pollution at all ! Double or Triple Engine Life and 400% to 900% Increase in Fuel Mileage <><

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C.A.R.B. Approval in the works . This is the Real Mc Coy !

Dennis B. Drake President Better and Better Technologies Inc.  
Global Sales of Clean Green Technologies for a Better World <><

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[www.installersupport.info](http://www.installersupport.info) Always looking for Mechanics to learn how to install and tune our HAFK Kit

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[www.Rockin69.com](http://www.Rockin69.com) Saving the Planet <>< July 10th 2009 Is Energy Independence Day in USA & Canada ! International Tesla Electric Company will rise to Save the Planet with Clean Green Electricity <><

PS: If we are not supported by the World Public then this is your Future [www.policestateplanning.com](http://www.policestateplanning.com)

Hydrogen-on-demand does not need costly infrastructure and

makes cars safer. Hydrogen-on-demand would not only remove the need for costly

hydrogen pipelines and distribution infrastructure, it would also make

hydrogen vehicles safer. "The theoretical advantage of on-board generation is that you don't have to muck about with hydrogen storage," says Mike Millikin, who monitors developments in alternative

fuels for the Green Car Congress website. A car that doesn't need to

carry tanks of flammable, volatile liquid or compressed gas would be

much less vulnerable in an accident. "It also potentially offsets the

requirements for building up a massive hydrogen production and distribution infrastructure,"

Dennis B. Drake President Better and Better Technologies

1444 Living Desert Dr # 75 Las Vegas NV 89119

702-944-0376 DennisDrake@cox.net www.Rockin69.com

Attachment: [www.arb.ca.gov/lists/sp-general-ws/28-picc\\_commercial.wmv](http://www.arb.ca.gov/lists/sp-general-ws/28-picc_commercial.wmv)

Original File Name: PICC Commercial.wmv

Date and Time Comment Was Submitted: 2008-07-07 06:51:21

No Duplicates.

**Comment 28 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gregory

Last Name: Benz

Email Address: benztech@mindspring.com

Affiliation:

Subject: Is this a good idea?

Comment:

More and more top-tier world experts on climate, such as the founder of The Weather Channel and the head of the meteorolgy department at MIT, have said that climate change as presently occurring is not primrily anthropogenic in nature, nor is warming necessarily a bad thing. Before legislating major economy-wrecking initiatives, don't you think considerably more study is needed?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 07:41:25

No Duplicates.

## **Comment 29 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jacob

Last Name: Hall

Email Address: janthonhall@gmail.com

Affiliation:

Subject: We don't need perfection, we need progress

Comment:

After reviewing the main thrust of this plan, I cannot help but agree with so many other comments that it represents an unfeasible adherence to the zero-waste, zero-emissions orthodoxy. This is an untenable goal.

While I agree that that is where our society should be someday, there is absolutely zero chance we will get there overnight. What we need to be looking at, especially in terms of municipal and industrial waste, are the avenues where we can reduce our carbon footprint today, tomorrow, and in the near future. We need to use waste conversion technologies, and not keep filling our landfills and hoping everyone stops producing trash.

We need to ratchet down our emissions step by step, and not buy into the religiously-held belief that our way of living must become eco-neutral overnight. What is critical is the real pragmatism of doing things to save our planet over the long term, developing technologies and a lifestyle culture step by step that will lead our civilization to eco-neutrality. To get there, we must adopt progressive, although not perfect, solutions that will provide short and medium term environmental successes while concurrently reconfiguring our economic and technological engines towards the goal of carbon freedom.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 10:04:37

No Duplicates.

## **Comment 30 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Robert  
Last Name: Pousman  
Email Address: frostitute@yahoo.com  
Affiliation:

Subject: Timely Implementation of AB 32  
Comment:

Dear CARB Chair Nichols,

Global warming and its effects are the biggest domestic concern to me and my family. California, long a leader for not only the nation but the world in environmental policy, again has the potential to lead the world with rapid implementation of AB 32.

Rapid is the key. I urge that we hold polluters accountable for their financial and most importantly, the health effects that they impose on the public. Placing profit before health of the planet has to end. Strong regulations to reduce greenhouse gas emissions with even stronger enforcement is necessary immediately.

As the majority of California's greenhouse emissions are generated from transportation we also need Zero Emission Vehicles available as soon as possible. With the price of gasoline not decreasing the so-called iron will never be hotter and we must strike now.

We also need to radically increase our renewable energy portfolio in order to reach the goal of 80% reduction before 2050. We have the means, the brains and most importantly the need to do so immediately.

I thank you for your time and look forward to your response.

Robert Pousman  
20612 PCH  
Malibu, CA 90265

frostitude@yahoo.com

Please consider the environment and don't print

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 14:03:26

No Duplicates.

## **Comment 31 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Marston

Last Name: Schultz

Email Address: mschultz@cleanpower.coop

Affiliation: Clean Power Cooperative of Nevada County

Subject: The Better Biofuel

Comment:

The Road to Energy independence?

I would like to preface my remarks by saying, I am no expert. What I have put together here is from research on the net. I feel that we need to develop a holistic plan that takes into account several environmental problems where solutions compliment each other. This is a model. If a different model will accomplish the same thing, fine. I don't think waiting for the market place to decide is going to cut it. For those who may read this, I would appreciate feedback, positive or negative. Tell me where it won't work, but give me references.

mschultz@cleanpower.coop

Biofuels come in many forms, but the two that get the most attention are Biodiesel and Ethanol. There is, however, a better biofuel, a biofuel that does not suffer the drawbacks of either Biodiesel or ethanol. it works with both gasoline and diesel engines. There is no problem with cold starts. There is no competition for food crops. There is an existing infrastructure. In fact it has many advantages over these two biofuels.

Biogas - the better Biofuel

I maintain the best option for, biofuels is Biogas. Honda may have made the smartest move ever by introducing the Civic GX a car that runs on compressed natural gas CNG. What does that have to do with biogas. Well, natural gas is methane and Biogas for the most part is methane. Fuel can be produced for vehicles from human, animal, kitchen and garden waste by composing in an anaerobic process that creates methane. Methane is a green house gas (GHG) that is 20 to 25 times more potent than CO2. In other words, we don't want it in the atmosphere. But it makes great clean burning fuel. Not only is methane produced but the by product is a non-petroleum based fertilizer that can be used by farmers.

Other countries taking the lead

Compressed natural gas has taken off around the world as an alternative fuel. In Europe Sweden Denmark and Germany all are moving toward the use of CNG for transportation. . While Honda is

making the only CNG vehicle available in the US, Fiat and Volkswagen are planning to come out with a CNG vehicle in Europe. There are over 7 million CNG vehicles world wide.

## Sweden

Sweden is having a Fall conference on "The Biogas Highway" this Fall. Sweden has already converted 34 sewage treatment plants to produce biogas. Currently Sweden generate 54% of their gas for CNG vehicles through Anaerobic digestion of their waste. There are some Swedes who feel that generating biogas will lead to elimination of their dependence on petroleum. The following items show how Sweden has made this transition so successful.

Co-digestion of Multiple Waste Streams - Use of co-digestion technology to successfully digest multiple types of organic waste simultaneously is one of the key technological areas in which the Swedish biogas industry is significantly more advanced than the digester technology currently used in the US. Use of multiple feed stocks presents significant opportunities to increase digester output and efficiency and improve the biogas business case. (This could include biomass from clearing for fire suppression.)

Biogas Distribution Systems - Multiple possibilities for biogas distribution have been successfully demonstrated in Sweden. These distribution options include dedicated biogas pipelines between biogas plants and biogas refueling stations, injection of "partially cleaned" biogas into "town gas" pipeline networks for residential use, multiple options for over-the-road transportation of compressed biogas, and injection of upgraded biogas into the national NG pipeline network.

Bi-fuel Vehicles - Bi-fuel vehicles (vehicles using either compressed natural gas or gasoline as fuel) have limited availability in the US. In Sweden, however, bi-fuel vehicles with no significant compromises in functionality or performance are commercially available and have helped greatly in expanding the market for NGVs to private individuals.

Transit Buses as "Anchor Customers" for Biogas Plants - In Sweden, municipal transit bus fleets designed to operate on compressed natural gas (CNG) typically act as the "anchor customers" for new biogas plants. Transit buses are excellent candidates for biogas consumption due to their high fuel usage, fixed routes and centralized refueling facilities." Sweden even runs a train on biogas.

## Germany

"The German gas economy and the automobile industry are geared up for the further development of natural gas fuel infrastructure, with the number of natural gas filling stations set to climb above one thousand, according to Dr. Gerhard Holtmeier, Speaking at the 2008 Automobil International (AMI) he referred to the wide coverage of supply and number of new natural gas vehicle (NGV) models as reasons why discussion on limited availability is now a thing of the past.

He said the advent of renewable biomethane has also contributed to the popularity and expansion of this alternative fuel in Germany, in that biomethane can be used by natural gas vehicles without

technical changes to the vehicle because it possesses the same quality as natural gas. Volkswagen indicated natural gas turbo engines could also be employed in models in the future. Representatives of Fiat and OPEL also said they are working on the development of natural gas turbo engines. The OPEL Zafira CNG turbo is expected to be available at the beginning of 2009."

#### Argentina

Argentina has over a million NGVs and is converting 9000 vehicles a month. They have more than 1020 CNG fueling stations.

#### United States

Natural gas vehicles NGVs are nothing new to the U.S. Companies with fleets of trucks, governments some public transportation are now running on natural gas. There is an existing fuel station infrastructure throughout the U.S.

One of the real pluses to natural gas is that it does not have to be delivered by truck if the fueling station is within range of a natural gas pipeline. This reduces the need to "deliver" the gas. This also makes it possible to fuel up at home with. A home appliance, known as Phill, which is sold by Honda can be installed where you park your car over night.

Other advantages to the use of natural gas is that is cheaper, burns cleaner. increased the life of the engine, and reduces the amount of oil changes.

#### T. Boone Pickens

Installation of renewable Solar and Wind installations is growing rapidly, but Biogas could be much bigger. It is the elephant in the room that few people in the US are talking about. Yet!!!

Billionaire, T. Boone Pickens, is investing 10 billion dollars in a huge wind farm which will feature 2,700 wind turbines generating 4,000 megawatts. The equivalent of 2 nuclear power plants.

Pickens' wind farm is part of a wider vision for replacing natural gas - primarily an electric power-generation fuel now --with wind and solar for power generation, to free up more clean-burning natural gas - to power automobiles instead.

Pickens states that shifting natural gas used in power generation to transportation needs could cut U.S. crude oil imports by nearly 40 percent.

In fact Pickens has started another company, Clean Energy, that is installing a CNG fueling stations where there is a market for CNG.

#### Energy independence for California?

What if California were to start a statewide program to use all our organic wastes to generate clean burning Biomethane. If each county were to build an anaerobic digester plant at the transfer

station or land fill and every waste water treatment plant and negotiate a contracts with energy providers to purchase the methane to be injected into the natural gas grid? What if the State decided that all new state vehicles be required to run on CNG or electricity?

## 20 Reason for California to Embrace the CNG/Biogas Economy

1 CNG is cheaper than gasoline.

This is true. CNG is 30% cheaper than gasoline per Gas Gallon Equivalent (GGE). As the gasoline prices go up, CNG prices go up SLOWER. Creating our own methane will keep CNG prices down.

2 CNG is "renewable".

As described above, we can create our own source of methane through anaerobic digestion to run our vehicles.

3. CNG is the cleanest burning fuel for vehicles.

The Honda Civic GX CNG vehicle is the cleanest car on the road.

4 The Infrastructure for Natural Gas already exists.

It is all around us. PG&E has a fueling stations throughout their territory.

Honda will provide a booklet showing where to find CNG fueling stations are in California. Many converted diesel trucks are using CNG. The cleanest burning buses in

the country are the CNG buses in Sacramento. As demand for CNG increases, it will be easy to expand the supply grid.

5 CNG is a proven technology.

No breakthroughs needed. CNG vehicles have been on the road for years in this country. They have an excellent safety record

6. CNG will extend the life of the engine

CNG has a more efficient combustion than liquid fuels, does not allow sediment formation, keeps spark plugs clean, and lubrication is better and more effective as it does not wash the cylinder walls of the engine. The lubricant lasts longer and performs better allowing longer intervals between each oil change. CNG also has a larger octane number than gasoline, so it does not produce self-ignition.

7 CNG vehicles can be refilled at home

A "home appliance" called Phill can be installed where you park your CNG vehicle overnight. You can start every day with a full tank of gas.

8 CNG vehicles are quieter

Next time your in Sacramento seek out one of the CNG busses to see how much quieter they are than diesels. Some communities are REQUIRING that their waste management vehicles run on CNG. This would probably make the people living around the Transfer Station very happy.

9. The byproduct in the anaerobic process is fertilizer.

Once the methane is extracted from the waste feed, What is left can be used as fertilizer and it replaces petroleum based

fertilizers

10 Save County costs

The Counties won't have to pay to have our organic waste trucked to a landfill.

11 Will keep our organic waste out of the landfill

Finding places to bury our garbage is getting more difficult. It is becoming necessary to

truck wastes further away from our communities. When it is buried, the anaerobic process begins and Methane is released to the atmosphere, something we don't want.

Methane is a Green House Gas that is 20 to 25 times more potent than CO2.

12 Thus, we reduce GHG production.

13 Create green jobs

We will need people to build and run these anaerobic digesters.

We may want to create some additional fueling stations.

14 Creates a decentralized source of renewable energy

With the Cooperation of the energy companies we could have Digesters throughout the

California that could produce Biogas for the grid

15 Utilize waste from the fire suppression clearing program

Green waste, needles, leaves and small branches and shrubs can be part of the mix of organic material used to produce Biogas.

16 New Refueling stations could tie into the Natural Gas Grid

Unless the fueling station is remote, Trucks will no longer be needed to deliver the fuel,

thereby reducing fuel consumption for these deliveries

17 Potential business to convert existing vehicles to bifuel CNG/gasoline

Unfortunately Honda only sent 1000 CNG vehicle to the states for 2008.

They are all sold for this year. With the Tax incentive of \$4,000 federal and \$3,000 State, they went fast (sticker price was \$25,000). Rather than expect everyone to buy a new CNG vehicle we should attempt to make conversions of existing vehicles, thereby not sending good vehicles prematurely to the wrecking yard and wasting all the embedded energy that went into making them. Since conversions can be made bifuel

(CNG/gasoline), This will help ease the transition to new CNG vehicles.

If the State adopted a CNG policy, I'll bet other car manufacturers would soon produce CNG vehicles.

18 Provides a transition to the hydrogen economy

When the Fuel Cell vehicle is finally available, it very likely be more expensive than the

typical new car but if a car is fitted for CNG it can be converted to a hydrogen

burning vehicle until fuel cell vehicles are affordable.

19 Sustainable

As the population increases, more waste will be produced.

Hence more fuel can be produced. In other words it is sustainable.

20 We would be creating the cleanest fuel next to Hydrogen  
This means our air will be cleaner.

A Holistic approach

In conclusion, going to a CNG economy is the most sensible way to meet the challenge of high gasoline prices, air quality and our mounting waste disposal problems.

Currently Biogas generating plans are combined with electric generators, to produce electricity. Doing so wastes over 50% of the energy from the gas. Biogas plants will be far less expensive to build than a biogas/electrical generating plant and will have less environmental hoops to jump through to pass government rules and regulations. Since Sweden is further advanced in the science of anaerobic digestion I would suggest hiring one of the Swedish firms as consultant to carry out this program.

Injecting the gas generated into the natural gas grid is the most sensible approach. PG&E has already contracted with a dairy farm in the Central Valley to buy Biogas generated methane, why not from the rest of us.

Of course, this plan will take a lot of inter-agency planning. Let us set a goal and move forward.

Marston Schultz  
530 274-9913  
mschultz@cleanpower.coop

Attachment: [www.arb.ca.gov/lists/sp-general-ws/32-\\_the\\_road\\_to\\_energy\\_independence.pdf](http://www.arb.ca.gov/lists/sp-general-ws/32-_the_road_to_energy_independence.pdf)

Original File Name: The Road to Energy independence.pdf

Date and Time Comment Was Submitted: 2008-07-07 15:36:05

No Duplicates.

**Comment 32 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: James

Last Name: Miller

Email Address: jrsmiller@yahoo.com

Affiliation:

Subject: Cap and Trade

Comment:

-The cap and trade concept should include some cross pollutant evaluation system to value which pollutants have the specific higher value so that economic calculations can be made to reduce the Global Warming Potential best.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 16:41:23

No Duplicates.

**Comment 33 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Richard

Last Name: Pruetz

Email Address: arje@attglobal.net

Affiliation:

Subject: Land Use

Comment:

I understand that the draft plan to meet global warming goals has little reliance on efficient land use. As a land use planner, I would contend that a great deal of energy conservation can be accomplished by the mixing of land uses and the building of compact, pedestrian-friendly communities. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-08 16:49:07

No Duplicates.

**Comment 34 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Raymond  
Last Name: Woods  
Email Address: basiclogicatwork@yahoo.com  
Affiliation:

Subject: energy without fuel natural air filtration  
Comment:

To Whom it may concern:

My name is Raymond Woods and I have an idea a concept if u will, that will create energy with out fuel. This unit can be used to power your home to light your streets, and to be used as a source of transportation.

California has always been on the cutting edge of innovation, I have been looking for funding to make this idea come true. With just a little help we could change the world as we know it today. I am not talking about a little power unit that needs to ve plugged in to recharge, I am talking about a unit that is big enough to power a home, to power a full size car 24/7 with no down time.

If I have peeked your intrest please contact me at basiclogicatwork@yahoo.com or write me at 7815 Grant lane #101 Overland Park Kansas 66204 or 913-642-1478 and we will go into more detail.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-11 13:36:38

No Duplicates.

**Comment 35 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: ray  
Last Name: clanton  
Email Address: kellyclanton@yahoo.com  
Affiliation: none

Subject: sincronization of traffic lights to save gas and reduce pollution  
Comment:

Letter to the mayor of Bakersfield (applies to all cities) With gas prices up, good oil revenues, and house building down (planners not as busy), POLLUTION IN THE AIR, I suggest you direct the city manager to sincronize the all new TRAFFIC lights . On gosoford, they installed quick change lights so when exiting sams club, one car immediately stops 10 cars going down gosoford. Also, why are there so many lights in front of SAMS and KOHLS? you should collect and feed the main roads. You may need to hire " big city" planners.

With these prices, stop the sprawl, and spend cash on RR bridges, sincronized lights, fewer lights, etc. Think about Americas money going to foreign places to pay for oil. This issue is top priority to save our way of life. Also, please require POWER offsets (wind energy) to offset new developments. (see pickensplan.com).  
Thanks.

Ray Clanton

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-12 21:32:50

No Duplicates.

**Comment 36 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ruth Ann

Last Name: Bertsch

Email Address: rbertsch@stanfordalumni.org

Affiliation: Sacramento Area Bicycle Advocates

Subject: no provisions for walking or bicycling in the Scoping Plan

Comment:

I agree with Walt Seifert's observations that the draft Scoping Plan developed by the California Air Resources Board (ARB) is critically short in provisions for walking and bicycling. Interestingly, there are provisions for light rail. For people to be willing to use light rail, however, they need to be able to walk from the station to their destination easily, comfortably, and safely. The nations which are successful in getting their population to avoid relying daily on single occupancy vehicles make public transportation easy, walking and bicycling fun, and make using cars difficult and expensive. My comments don't even begin to address the public health benefits of stimulating the population to walk to a train or bus station, walk to their destination, or bike. Those benefits are tangible and phenomenal.

Sincerely, Ruth Ann Bertsch, M.D., Ph.D., F.A.C.P.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 07:31:39

No Duplicates.

## **Comment 37 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Bob  
Last Name: Johnston  
Email Address: rajohnston@ucdavis.edu  
Affiliation: UC Davis

Subject: Unequal Treatment of Uncertainty  
Comment:

The Draft Plan says that the policies in the Local Govt. Actions category are uncertain and so only get 2M tons. However, many of the recommended technical fixes are also very uncertain, such as Light-Duty Vehicle GHG Standards (delayed by USEPA), Sustainable Forests (scientifically unclear), and Energy Efficiency (which has not worked in the past, due to more appliances and also the occupants change behaviors).

There is a considerable body of empirical literature and of modeling studies, sent by me previously to the Local Govt. Actions category, that largely agree that land use policies can have a large effect on reducing VMT. The empirical research and the modeling studies often show similar effects for each of the different policies, such as density, mix, and walkability, that are in basic agreement re. magnitude of effects. This gives one some confidence in the results. Also, many of the modeling studies in the U.S. and Europe have used advanced urban models where one can examine policies one by one, or in groups. These modeling studies are in general agreement about the effects of various policy packages, too.

I urge the ARB staff to treat uncertainty in a more evenhanded fashion, across these policy areas.

A more reasonable target for Local Govt. Actions would be 6M tons, for 2020. This represents about 1M ton per year of policy implementation, 2014-2020, which is consistent with the middle of the pack of the empirical research and the modeling studies.

Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 11:03:57

No Duplicates.

**Comment 38 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Andrew

Last Name: Fynn

Email Address: andrew@marincarbonproject.org

Affiliation: Marin Carbon Project

Subject: Decrease-able Cap

Comment:

It is at least feasible that California will achieve GHG reductions faster than anticipated. My suggestion is that ARB build in the ability to increase the aggressiveness of the cap if GHG reductions occur faster than anticipated—as the result of breakthrough technologies or other unforeseen advances. (This cap could only come down, never go up). This reevaluation could be triggered at a certain point in the market—for example when the price of offsets dips below \$30 per ton CO<sub>2</sub>e. (This figure is chosen because the suggested price per ton of CO<sub>2</sub>e under the fee system is \$10-50.)

ARB (with WCI) might also consider a minimum price for offsets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 11:13:06

No Duplicates.

## **Comment 39 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Betty

Last Name: Anderson

Email Address: bettysjam@earthlink.net

Affiliation:

Subject: CARB Draft Scoping Plan

Comment:

I support the efforts of California Air Resources Board (CARB) in their efforts towards reduction of greenhouse gas emissions in the State of California. However, there are certain areas within the Draft Scoping Plan where I have issues or questions.

As background let me first say that I am a resident of Mira Loma. I am also a member of the board of directors for the Jurupa Community Services District, a retail water district (also in Mira Loma), and a homeowner with solar electricity. I am writing as a private individual and not as a board member.

Mira Loma as you may know is home to the worst particulate matter air pollution in the nation. This has been exasperated by the goods movement industry. Mira Loma is in a goods movement corridor and has over one hundred mega warehouses. In addition, Mira Loma has the largest auto distribution center in Southern California. These autos are brought into the distribution center by Union Pacific (UP) trains and leave the center by auto carrier trucks. Even though CARB has entered into a Memorandum of Understanding (MOU) with the UP to reduce emissions from these trains, this community is frustrated that the MOU was not as stringent as what the South Coast Air Quality Management District (SCAQMD) had wanted. CARB entered into this MOU without first consulting the SCAQMD or the communities in the goods movement corridors. I believe that CARB should work with the Federal Railroad Administration (FRA) to amend the MOU and require more stringent emission regulations for the railroads. In addition, I believe that CARB should work with the UP to increase the number of grade separations throughout the goods movement corridors to decrease the number of idling trucks and cars waiting at railroad crossings.

On page 60 of the Draft Scoping Plan, under item six (Public Health Analyses), it seems to me that there have been numerous public health analyses already done that CARB can easily incorporate into the study. Among them is the USC Children's Health Study which studied children living in goods movement corridors for over 10 years and the effects of air pollution on these children. I don't see the need to waste more time, money and effort for more studies.

On page 70 of the Draft Scoping Plan, under D. Enforcement, it states "ARB also partners with local, State and federal agencies to carry out inspections and where necessary prosecute violators". In this community, this is almost impossible because Mira Loma is

in unincorporated Riverside County. That means that the Sherriff's department answers crime calls while the California Highway Patrol (CHP) answers calls dealing with motor vehicles. This adds an additional stress to the CHP which is already understaffed. Additionally, if CARB is working with federal authorities, there needs to be more done primarily at interstate highway borders with other states to regulate out of state truck emissions as well as emissions from trucks entering the country from Mexico under the North American Free Trade Agreement (NAFTA).

On page 28 of the Draft Scoping Plan, under item number 8. Water, it states "the State will also establish a public goods charge for funding investments in water efficiency that will lead to reductions in greenhouse gases" and "a public goods charge on water can be collected on water bills and then used to fund end-use water efficiency improvements, system-wide efficiency projects and water recycling." Isn't this tax a violation of Proposition 13? Why is the state trying to impose a tax on end users who already pay a high cost for water that has to be treated because in the past the State allowed local industries to pollute it. The Mira Loma area used to be the home of one of the largest dairy preserves in the State. Now we have a new community called Eastvale with massive tracks of houses that have been created on former dairy land. So is the State making the former dairy farmers clean the high nitrates and other salts out of our ground water from their former dairy farms? Is the state making developers of homes do this? There are other toxins that the State and Federal government have identified that are in local ground water. The State Department of Public Health makes local water companies clean the water to make it safe for consumers. Who pays for the infrastructure to clean these chemicals out of the water? Not those who dumped it to begin with, but the end use consumer. Does this infrastructure use electricity? Of course it does, and the end use consumer pays for that too!

The ARB also talks about the energy used to transport water to the end use consumer. Didn't water agencies such as the Metropolitan Water District build some of the dams along the rivers that created hydroelectricity? Edison does have tremendous infrastructure for hydroelectricity around these dams, but how much did they contribute financially to the construction of these dams? Does Edison profit financially from this electricity? Can this profit be redirected to make water conveyance less costly?

Finally, as previously mentioned, my husband and I installed solar panels on our home. Each month we get a bill from Edison for less than \$2.00. This is so a meter reader can come over and check to see how much electricity we contribute to the grid and a data processor can write up a bill. The cost of solar power is tremendous. The rebates and incentives are inadequate to offset this cost, making solar unfeasible for most homeowners.

Edison charges us a fee for the months when we use their electricity. On most months, when we contribute to the grid, Edison should pay us just like they do to other Industries where they get their fuel for electricity. The way this is figured is that Edison will charge us for the energy we used during the year at the end of our solar year if we used more than we contributed to the grid. However, if we contribute more into the grid than we used, Edison will not pay us for what we contributed! This is

unfair! Edison should pay us for electricity we put into the grid just like they pay for fuel for electricity. This will help make the cost of solar energy more feasible for homeowners and businesses alike.

I hope that the concerns and questions that I addressed in this letter are taken into consideration when formulating the final Climate Change Plan.

Sincerely,

Betty A. Anderson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 15:10:55

No Duplicates.

## **Comment 40 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Susanne  
Last Name: Moser  
Email Address: promundi@susannemoser.com  
Affiliation:

Subject: evaluation criteria of mitigation measures and mitigation-adaptation link  
Comment:

Dear drafters of the scoping report,

I have briefly reviewed your document and am missing two important considerations:

1) Other than how much a particular measure reduces GHG emissions, I see no criteria by which to evaluate the proposed actions. A reduction of GHG BY ANY MEANS should not be acceptable. A systems perspective will quickly reveal that most actions, technological fixes, market and policy measures have UNINTENDED consequences. They could be economic, environmental, social, political or cultural. I do not see that such considerations are entering your scoping plan. It seems unacceptable that the state of California should try to solve one problem by inadvertently introducing another. Thus, any proposed measure should be evaluated against not only the impact toward meeting the overall emission reduction goal, but other ancillary costs, impacts, or benefits. And the economic cost and benefits should most certainly not be the only criterion.

2) The IPCC has clearly recognized in its most recent assessment that there are important interactions between mitigation and adaptation (see IPCC, 2007, Working Group II, Chapter 20, if I recall correctly). Some mitigation measures make adaptation more difficult or easier, while some adaptation measures increase or help decrease GHG emissions. This report does not recognize this important interaction. As the state begins adaptation planning, it seems inconceivable that one effort should not consider how it will impact another. Well, it's not inconceivable, it's done all the time, but it SHOULD be avoided. Don't make your work elsewhere more difficult by ignoring this important connection.

Thank you for improving the report by these considerations.

Sincerely,

S. Moser, Ph.D.  
independent Researcher  
Santa Cruz, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 15:22:04

No Duplicates.

**Comment 41 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rick

Last Name: Garcia

Email Address: RGarcia@ibew47.org

Affiliation: IBEW Local #47

Subject: Labor and solar energy

Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/44-rickgarcia.pdf](http://www.arb.ca.gov/lists/sp-general-ws/44-rickgarcia.pdf)

Original File Name: RickGarcia.pdf

Date and Time Comment Was Submitted: 2008-07-16 12:24:43

No Duplicates.

**Comment 42 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 43 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: John  
Last Name: Steffen  
Email Address: jlfsteffen@yahoo.com  
Affiliation:

Subject: CARB's draft scoping plan comments  
Comment:

California desperately needs a strong plan of action to both slow global warming and achieve immediate reductions in smog and other dangerous air pollutants.

The state of California is facing a public health crisis, experiencing 14-24,000 premature deaths from air pollution yearly, 350,000 asthma attacks and 2 million missed school days from children suffering asthma attacks, thousands of hospitalizations and emergency room visits, and reduced lung function growth in children.

I urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments. The plan should also include additional strong regulatory measures on industrial sources to reduce emissions from petroleum refineries, power plants, cement manufacturers, and others sources.

It is vitally important the plan demonstrate that the variety of proposed measures will not only make rapid progress toward reducing greenhouse gases, but will also provide local benefits to communities in terms of improved air quality and public health.

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-16 14:14:12

217 Duplicates.

**Comment 44 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Edward

Last Name: Moreno

Email Address: edmoreno@co.fresno.ca.us

Affiliation:

Subject: Comments provided at Fresno Scoping Plan meeting

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/81-07-14-08\\_ltr\\_chuck\\_shulock\\_-\\_carb.pdf](http://www.arb.ca.gov/lists/sp-general-ws/81-07-14-08_ltr_chuck_shulock_-_carb.pdf)

Original File Name: 07-14-08 Ltr Chuck Shulock - CARB.pdf

Date and Time Comment Was Submitted: 2008-07-16 15:24:30

No Duplicates.

**Comment 45 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Debra

Last Name: Clarke

Email Address: walmartcashier20002003@yahoo.com

Affiliation:

Subject: RE: Your plans

Comment:

I think we should have done something about this a very long time ago, but nobody cared that many people would die because of this. You need to get on the ball and help us get this air cleaned up a lot sooner than 2025 because by then we will have such unbreatheable air, we will all be dead. Please care about this because you are breathing this nasty air, too!

Sincerely,

Debra Clarke

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-16 17:19:05

No Duplicates.

## **Comment 46 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Leonard

Last Name: Conly

Email Address: lconly@lmi.net

Affiliation: Friends of Bus Rapid Transit

Subject: AB 32 Implementation

Comment:

California desperately needs a strong plan of action to both slow global warming and achieve immediate reductions in smog and other dangerous air pollutants.

The state of California is facing a public health crisis, experiencing 14-24,000 premature deaths from air pollution yearly, 350,000 asthma attacks and 2 million missed school days from children suffering asthma attacks, thousands of hospitalizations and emergency room visits, and reduced lung function growth in children. Our water supply is always at risk.

We urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage (approximately 30%) of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments.

One policy that can help us reach this goal is the implementation of Pay As You Drive Auto Insurance which can reduce greenhouse gas emissions from private motor vehicles in California by as much as 2.4%. This figure is derived using a recent Brookings Institution study which shows that PAYD can reduce VMT by 8% and the fact that 30% of California's greenhouse gas emissions result from the private automobile. The Brookings Institutions conclusions about PAYD insurance are:

"With insurance costs that vary with miles driven, we estimate that drivers nationwide would reduce miles traveled by an average of 8 percent. To put that in perspective, it would take a one dollar increase in the gas tax to achieve an equivalent reduction in vehicle miles traveled (VMT). An 8 percent reduction in VMT would yield social benefits of \$51.5 billion, largely from reduced congestion and accidents. It would reduce carbon emissions by roughly 126 million tons per year, which equals 8.4 percent of the carbon emitted by cars and trucks. And PAYD can achieve these gains while actually reducing the cost of driving for most drivers. Roughly two-thirds of households would enjoy reduced premiums under PAYD, and the average savings for those two thirds of households would be \$270 per car per year, equal to 28 percent of the average annual U.S. car insurance premium."

Pay-As-You-Drive Auto Insurance:  
A Simple Way to Reduce Driving-Related Harms and Increase Equity  
Jason E. Bordoff and Pascal J. Noell  
The Hamilton Project, The Brookings Institution  
Preliminary Draft: April 17, 2008

We urge the California Air Resources Board to work with the California Department of Insurance to implement Pay As You Drive (PAYD) Automobile Insurance with odometer-based verification.

The plan should also include additional strong regulatory measures on industrial sources to reduce emissions from petroleum refineries, power plants, cement manufacturers, and others sources.

It is vitally important the plan demonstrate that the variety of proposed measures will not only make rapid progress toward reducing greenhouse gases, but will also provide local benefits to communities in terms of improved air quality and public health.

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

Leonard Conly  
Friends of Bus Rapid Transit  
[www.friendsofbrt.org](http://www.friendsofbrt.org)  
510-459-5841  
1252 Gilman Street  
Berkeley, CA 94706

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-16 19:42:16

No Duplicates.

**Comment 47 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Phil

Last Name: Erro

Email Address: philiperro@sbcglobal.net

Affiliation:

Subject: Scoping Plan

Comment:

see attached letter and pamphlet

Attachment: [www.arb.ca.gov/lists/sp-general-ws/139-philiperro.pdf](http://www.arb.ca.gov/lists/sp-general-ws/139-philiperro.pdf)

Original File Name: philiperro.pdf

Date and Time Comment Was Submitted: 2008-07-17 10:52:53

No Duplicates.

## **Comment 48 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Cristy  
Last Name: Wojdac  
Email Address: knitwit76@yahoo.com  
Affiliation: Defenders of Wildlife

Subject: maintain & strengthen wildlife and habitat conservation  
Comment:

As an educator of children I feel very strongly about preservation of wildlife and habitat as well as clean air for future generations. I also recognize that by setting high expectations we encourage ourselves to rise to the challenge and encourage others to follow our positive lead. For these reasons I am happy to see that wildlife and habitat conservation are important parts of CARB's scoping plan. Thank you for all your efforts to promote this benchmark for addressing proactive Global Warming solutions. I respectfully submit a few suggestions for improvement of your final plan.

First, I urge you to make it clear in the scoping plan that adequate annual funding must be dedicated for climate change research, monitoring, and planning to help fish and wildlife adapt and survive climate change challenges. Without dedicated funding, our state's biodiversity is a great risk.

Secondly, I support a strong ,cost-effective cap on emissions and a market-based program to stabilize greenhouse gas concentrations at a level that ensures the well-being of communities and ecosystems.

I urge you to put in a more robust carbon reduction target for forests. The scoping plan's target is too low. Forest conservation can provide a greater reduction in carbon emissions. It is important that you utilize this.

I suggest that you ensure that CARB, not the Board of Forestry, maintains the least authority on all forest carbon accounting.

Lastly, I urge you to move quickly to establish scientifically derived protocols for other habitats such as wetlands and grasslands.

Again thank you for all your hard work, and I appreciate the time you have taken to consider public comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-17 13:08:10

No Duplicates.

**Comment 49 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Lee

Last Name: Harrington

Email Address: cseghers@arb.ca.gov

Affiliation: Southern California Leadership Council

Subject: AB 32

Comment:

See attached letter and study

Attachment: [www.arb.ca.gov/lists/sp-general-ws/148-southerncalifornialeadershipcouncil.pdf](http://www.arb.ca.gov/lists/sp-general-ws/148-southerncalifornialeadershipcouncil.pdf)

Original File Name: southerncalifornialeadershipcouncil.pdf

Date and Time Comment Was Submitted: 2008-07-17 14:00:08

No Duplicates.

## **Comment 50 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Arthur

Last Name: Unger

Email Address: artunger@att.net

Affiliation:

Subject: Comments on many AB 32 implementation opportunities

Comment:

Here are my comments on CARB's June 2008 Discussion Draft of the Climate Change Draft Scoping Plan to implement the California Global Warming Solutions Act of 2006 (AB 32).

I applaud your goal of reducing annual Green House Gas (GHG) emissions to 80% of 1990 levels by 2050 despite the huge population increase that will occur in 2008 and in all years in the immediate future.

For lazy folks like me, the study introduction might include:  
Total number of megawatts CA can generate under stress  
Sources of electricity  
Uses of electricity by industry in Megawatt hours, including pumping water  
Origin of emissions (figure 1, page 7, and slide 5 of 7/14/08 with a little more detail)

Here is the part of what I probably said at the 7 14 08 workshop that I can not fit into the Roman numerals and numbers used in the Discussion Draft:

Thank you for holding this hearing next to the Amtrak station. As we learn to travel without single or limited occupancy vehicles, more and more public events need to be held near public transit. Moving offices from an inner city neighborhood out to the land of the car, as the SJVAPCD did several years ago, was an error. Inner city neighborhoods and their transit must be made so safe that no one seeks security in a private vehicle.

Multi family homes emit less per person than free standing single person or single family homes. Public vest pocket parks, playgrounds and community gardens make such housing desirable.

The rest of my comments refer to the Roman numerals and numbers used in the Discussion Draft.

I B, table 1 Recycling and waste:

Please compare GHG produced by optimally nourishing a given plant with synthetic balanced fertilizer to the emissions accomplishing the same goal by using only compost. Emissions producing, transporting and applying the fertilizer must be added to any fertilizer emissions occurring while the fertilizer lies on the soil. Does the result justify asking farmers or home gardeners to compost? Are there advantages to mixing fertilizer into the soil, even if the mixing requires energy?

II B 1 "Cap and trade" must be compared to "cap and auction". I oppose either if it subjects some populations to more GHG than others; that could raise an environmental justice issue.

### II B 3 Green Buildings

I oppose helping people pay their fuel bills, although that is necessary in emergencies. Instead, reduce a home's carbon dioxide production by subsidizing insulation, installing double paned windows, providing education to the occupants, buying new efficient air conditioning or evaporative cooler and appliances, painting roofs and walls white and all the other green building techniques. For example, replacing worn paint on a low income house could be subsidized only if the owner chooses white paint.

### II B 7 Urban or Rural Forest

How long do the trees in these forests, such as fruit and nut trees, live or become non-productive? How long after death will it take them to release the GHG they contain? If they are used for fuel, is all their carbon released? Can they be used for fuel without releasing criteria pollutants?

### II B 9 Buses are sustainable vehicles

Recent increases in gasoline prices have increased ridership and may have decreased fatal automobile collisions. Imagine the ridership if buses went where folks wish to go.

Buses should produce as few criteria pollutants as possible. Bakersfield's "GET" buses do that by using natural gas; others may use other short chain hydrocarbons. There are small European diesel cars that emit little, I do not know if there are clean diesel buses.

Get rid of fare boxes on buses. Currently the fare box pays at least one fifth of the municipal bus line's cost. Bus riders reduce GHG and criteria pollutants; car drivers do the opposite. Not having a fare box makes taking on passengers easier for bus drivers and eliminates the cost of buying and maintaining the fare box. Traffic may move easier, and thus emit less, if more of us are in the bus.

Plain clothed police should patrol buses and drivers should be able to summon police by pushing a button with a hand or foot.

All new developments and alterations should accommodate buses. This includes bus stop pull outs along roads, bus stops in parking lots, benches and shelters.

### II B 12 Solar Roofs

All weight bearing surfaces in hot, sunny central California should be covered with solar voltaic panels. There is almost no transmission loss from such urban and suburban solar sources. Parking lots should be roofed with solar panels; the supporting poles should withstand collisions, thus avoiding electrocution from collisions.

### II B 13 Local Government Actions

I hope CARB staff will comment on proposals to develop small lots adjacent to larger lots and to build apartments next to free standing single occupancy or single family homes. CARB staff should attend City and County meetings to see the intense desire San Joaquin Valley residents have to live in large free standing homes on large lots. This may be one cause of the Valley's current

high incidence of foreclosures. This desire to sprawl, coupled with the absence of mass transit generates driving that generates much carbon dioxide. Failure to make the connection between transportation and land use is an indirect source of GHG and deserves a GHG Indirect Source Rule, as proposed on page 38.

Community Water should consider that the San Joaquin Valley gets six inches of rain a year at the southern end, increasing as one approaches Sacramento to eighteen inches. Yet our towns have many small manmade lakes, many of which are not diversions of our rivers and are not shared by many residents. Lakes are OK in eastern United States where there is often over forty inches of rain a year. Much of our water is pumped over the Sierras by fossil fueled pumps.

#### II B 15 Recycling and Waste

We need to compare the GHG generated by industrial production of inorganic fertilizer and the GHG generated by composting. The amounts of nitrogen produced by each method need to be compared; where California soil requires sulfur or phosphorous, those should be compared.

#### II B 16 Agriculture

##### Methane Capture at Large Dairies

Compare the methane and carbon dioxide produced by local Concentrated Animal Feeding Operations (CAFOs) with that produced by importing milk from the east and mid west; include the GHG produced by the dairies the milk is imported from. Include the GHG produced by importing water for the California dairies.

##### Sequestration in Permanent Crops

How long does a nut or fruit tree live compared to the length of time our planet will have a problem with green house gases? What happens to the carbon in a tree when it dies or is cut down? If the tree is buried, how much green house gas is generated by the machines that bury it, including the manufacture and fueling of those machines? Can a fallen tree create energy without releasing all of its carbon?

#### II C 1 Feebates

This was proposed for gasoline mileage by Senator Hart of Santa Barbara in the 1990s; I think it a good idea.

II C 2 Hurrah for carbon fees and water fees. With these fees, solar pumps will soon move most of California's water; some of the places water is moved are especially sunny. Semi-tropic water district (in or near Kern County) has used solar water pumps for years.

Thank you for the opportunity to comment,  
Art

PS Please provide me with all announcements concerning this project.

PSS I will send a hard copy upon request.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-17 17:06:20

No Duplicates.

## **Comment 51 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: elia

Last Name: bassin

Email Address: elia7272@gmail.com

Affiliation:

Subject: Transportation, Economics, Land Use comments

Comment:

Thank you for the efforts to keep California one of best leaders in the world. I am proud to be a part of this state!

After reading the scoping plan I have a few additional thoughts:

1. Vehicle Speeds - Please not the additional pollution contributed to cars traveling above posted speed limits. Much of the Scoping Plan framework describes broad long term plans. There are a few things we can do in the immediate future that will have compound benefits over the next 42 years. From my observation less than 10% of vehicles on an open road will drive within the speed limit. I proposed the Scoping Plan address the benefits of reduced emissions if the speed limit was strictly enforced over the next 42 years. Proposed implementation could consist of a sub department of the CHP, on a trial until 2020, which is self funded by the fees raised by speeding violation citations. In addition, 100mph maximum speed limits set by onboard computers on all private vehicles. My preference would be to go as far as lowering a freeway speed limit for single occupancy vehicles to 55 mph, however I doubt that is politically feasible.

2. Local Government Land Use - I did not see any mention in the Draft Scoping Plan pertaining to local government land use patterns that are contributing to un-sustainable development types. Having lost my faith in most local government official to behave in an honest and productive manner that best serves the public citizens in a sustainable manner would go as far as to recommend that there be a 12 year ban on "green fill" (agricultural and land with natural ecosystems helping to clean our air quality) development until 2020 where we can re-evaluate the climate situation. I hope the Scoping Plan can at least acknowledge a link towards local government development patters and contributions to vehicle miles traveled and un-sustainable use of California's limited resources. Developers and still make money and people can still have job through infill development using existing public infrastructure.

3. Concerns from the Private Business Sector -I support the economic finding made this far in the Scoping Plan. I would like to refute all concerns by private business claiming increased restrictions will hinder the economy and add excessive cost. Every time a dollar changes hands it has more value to the California economy, and the longer the dollar stays in California the more value it has. Every extra dollar spent, when done right, simply adds more purchasing power to more people. If a business

has to spend more on energy, but dollar goes towards an entire new industry then it will be best for everyone in California. I hope everyone can this of this as our next "trend" like the "Dot Com" silicone valley compute trend that brought some of the best years of economic growth California has ever seen. Protecting our natural resources and simultaneously keep California safe and beautiful and also create the next great economic trend providing a plethora of job and sustainable infrastructure.

4. For those critical of these efforts please think back 42 years to 1966 and imagine what our state has accomplished in that time and now imagine what amazing things we can do in the next 42 years.

Thank you for your time

-Elia Bassin

Citizen (Rancher, City Planner, Forest Firefighter...)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-18 16:53:44

No Duplicates.

## **Comment 52 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Eloise

Last Name: Gilland

Email Address: eloise@eeri.org

Affiliation:

Subject: CARB DRAFT 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, Eloise Gilland, as a member of CIPL and the Montclair Presbyterian Church in Oakland, 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 17:31:31

No Duplicates.

**Comment 53 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Irvin  
Last Name: Dawid  
Email Address: irvindawid@hotmail.com  
Affiliation: Sierra Club

Subject: ARB-AB 32 Climate Scoping Plan  
Comment:

California desperately needs a strong plan of action to both slow global warming and achieve immediate reductions in smog and other dangerous air pollutants.

I urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments.

The current plan is dreadfully weak in terms of reducing trips through improved local land use measures. Making cars 'greener' but continuing to be dependent upon them doesn't work....green cars plus fewer trips are the key.

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-18 21:47:58

No Duplicates.

**Comment 54 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mike

Last Name: Savino

Email Address: yogooombah@yahoo.com

Affiliation:

Subject: bicycle commuting should be supported

Comment:

The plan is critically short on support for increasing walking, cycling and public transit transportation choices. Out of 17 named greenhouse gas emission reduction measures, bicycling and walking don't even rate a mention. It's hard to fathom. What could be more effective and efficient than replacing automobile trips, which produce about one pound of carbon dioxide for each mile driven, with bike trips?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-18 23:09:32

No Duplicates.

## **Comment 55 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Elane

Last Name: O'Rourke

Email Address: pastor@campbellucc.org

Affiliation: Campbell United Church of Christ

Subject: Better and more just

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, Elane O'Rourke as a member of CIPL and pastor of the Campbell United Church of Christ, 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: 2008-07-21 15:30:36

No Duplicates.

## **Comment 56 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation: TNC, Audubon CA, Defenders of Wildlife

Subject: Comments on Draft AB 32 Scoping Plan

Comment:

Dear Ms. Nichols, Mr. Goldstene and members and staff of the California Air Resources Board,

Our organizations commend the California Air Resources Board (CARB) for producing the first economy-wide framework in the United States to address global warming. This plan is an important milestone and sets California on the path toward becoming a model for reducing emissions across all sectors of our state's economy.

Global warming is one of the most serious threats to wildlife worldwide. Average temperatures have increased by about 1.5 degrees Fahrenheit (°F) worldwide over the past century. According to the Intergovernmental Panel on Climate Change, if increases exceed more than 2.7°F to 4.5°F above current temperatures, 20 percent to 30 percent of all species worldwide are likely to be at increased risk of extinction. By 2050, temperatures in California are projected to increase by 2.4°F to 3.6°F, and by 2100, the projected increase is 4.1°F to 10.4°F. Clearly, global warming will increase the stress on California's already stressed plant and animal species. We need to address this problem comprehensively and quickly: the health of the natural systems on which our economy and way of life depend is at serious risk.

We are pleased to see in the draft scoping plan (the Plan) that CARB has responded positively to recommendations made by our organizations. The Plan suggests a strong and cost-effective cap on greenhouse gas (GHG) emissions and a market-based program to reduce greenhouse gas emissions from major emitting sectors. We support these criteria and recommend that in the final Plan, CARB specifically include forest-based offsets in the market-based program. The inclusion of forest-based offsets coupled with a strong declining cap will foster significant GHG reductions in a cost-effective, timely and efficient manner from capped sectors. It will also secure a role for natural systems, initially through forests, as effective GHG mitigation tools, a public service (among many others) that has been historically undervalued.

Furthermore, we appreciate that the Plan acknowledges the need to provide funding to help human communities and natural systems adapt to climate change through the collection of GHG revenues and the establishment of a California Carbon Trust. We urge that the final Plan dedicate at least 20% of the available funding to plans, projects and programs that foster adaptation allowing human communities and natural systems, wildlife, plants and habitat to

survive the negative impacts of global warming that will increase stress on these critical natural systems.

We also support the plan's recommendation to establish a firm target for forest carbon statewide. The draft Plan's proposed target of five mmtCO<sub>2</sub>e is modest and we recommend that ARB consider increasing this "floor" by re-evaluating input provided by the forest sector Climate Action Team (CAT) subgroup. In order for the state to maintain this level, policies and programs that address emissions from land conversion must be adopted. Towards that goal, we request that the final Plan clearly establish the use of CEQA as an appropriate tool to mitigate carbon emissions from forest and wildland (e.g., wetland and grassland) conversion. In addition to establishing this "no-net-loss" of forest carbon policy, we urge CARB to adopt a non-binding forest carbon restoration goal for the state and pledge to work with CARB to develop the specifics of this goal. Finally, we urge CARB to move quickly to establish scientifically derived protocols and processes to develop reduction and accounting methods for other habitats such as wetlands and grasslands.

To succeed in reducing emissions and addressing global warming, the final Plan must provide assurance that the reductions are real, measurable, and meet the other requirements of AB 32. Thus, the final Plan should specify that reductions from the forest sector be evaluated under the existing, CARB-approved, accounting methods, standards, and protocols acknowledging that CARB may adopt refinements to them over time.

As currently drafted, the role that CARB intends for the Board of Forestry and Fire Protection to play is vague. CARB should clarify that role soon to avoid confusion. In addition, the final plan should explicitly reaffirm CARB's responsibility as the lead agency for adopting reduction measures and other policies involving all sectors, including the forest sector, and including especially, the accounting rules and responsibilities for state and project level inventories.

The impact of local and regional land use decisions on GHG emissions is significant. In this area too, adoption of revised planning processes and other measures can reduce emissions from transportation, energy, water use and waste recycling beyond the values included in the scoping plan. We urge CARB to adopt an ambitious and meaningful target for reductions from the land use sector

A robust role for forests and other natural resource based projects is critical for the success of the Plan and the public's acceptance of it. Recent polling information released by Next Ten underscored the importance of establishing a comprehensive role for natural resources in the state's climate policy. Conducted last month, the poll found that

- 79 percent say that global warming is a serious threat to the economy and quality of life for California's future
- 88% strongly support protecting forests and natural areas that naturally remove global warming pollution from the air as part of the state's plan
- 81% recognize that protecting existing forest lands was very important as an additional benefit from addressing global warming.

In conclusion, we look forward to reviewing the technical appendices to the draft Plan when they are released and may submit

additional comments at that time. We commend CARB and its staff for their hard work in producing the draft AB 32 scoping Plan. We urge CARB to make firm and binding commitments in the final Plan to policies that fully capitalize on the capability of forests and other natural resource-based projects to address climate change both by avoiding emissions and increasing carbon sequestration.

Sincerely,

Michelle Passero  
The Nature Conservancy  
Kim Delfino  
Defenders of Wildlife  
Dan Taylor  
Audubon California

Attachment: [www.arb.ca.gov/lists/sp-general-ws/174-coalition\\_comments\\_on\\_draft\\_ab\\_32\\_scoping\\_plan\\_7.18.08.doc](http://www.arb.ca.gov/lists/sp-general-ws/174-coalition_comments_on_draft_ab_32_scoping_plan_7.18.08.doc)

Original File Name: Coalition comments on draft AB 32 Scoping Plan 7.18.08.doc

Date and Time Comment Was Submitted: 2008-07-21 16:40:58

No Duplicates.

**Comment 57 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: George  
Last Name: Hague  
Email Address: gbhague@gmail.com  
Affiliation:

Subject: Off-Highway Vehicals pollution needs strong/quick cleanup standards  
Comment:

Dear Ms Nichols,

As the CARB Chair would you please make sure all decision makers have a copy of the above document  
-Fuel to Burn: the climate and public health implications of off-road vehicle pollution in California.

I am a resident of Riverside County and am very concerned about the use of all types of motorized off highway (or roadway) vehicles(OHV) in my area and the health problems they add to our non attainment area. This report mentions how in California they emit 500 million pounds of carbon dioxide into the atmosphere each year. "This is the equivalent to burning 500,000 barrels of oil". The report also mentions that the 26 million gallons of gasoline consumed by OHVs each year in California is equivalent to the amount of gasoline used by 1.5 million car trips between Los Angeles and San Francisco.

In addition to OHVs you need to also factor jet skis, motor boats, snow mobiles and private airplanes into the final plan. Without a strong plan to immediately deal with all of the above sources of pollution-not dragged out over years- you will need to remove the word "Solution" from the Act.

Please notify me of all future documents and meetings in Southern California related to this topic.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/175-fuel\\_to\\_burn\\_for\\_web-2.pdf](http://www.arb.ca.gov/lists/sp-general-ws/175-fuel_to_burn_for_web-2.pdf)

Original File Name: Fuel\_to\_Burn\_for\_Web-2.pdf

Date and Time Comment Was Submitted: 2008-07-22 12:45:51

No Duplicates.

**Comment 58 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 59 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Janet  
Last Name: Bell  
Email Address: jbell@mwdh2o.com  
Affiliation: Metropolitan Water District

Subject: Comments Deadline on Scoping Plan and Appendices  
Comment:

Hello,

Appendices to the scoping plan were released yesterday afternoon, with comments due on August 11th. Comments on the scoping plan are due August 1st. It would be beneficial and effective to have one comments deadline for the plan and the appendices, and to extend the August 1st deadline to August 11th for both sets of documents. It really is difficult to review one without the other, since the documents and the comments are integrated.

Please let us know if this can be accomplished. At the workshop on July 8th, staff indicated that there was some flexibility in the comment deadlines.

Thanks for your consideration.

Janet Bell  
EHS Program Manager  
Metropolitan Water District of Southern California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 08:09:34

No Duplicates.

**Comment 60 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ann  
Last Name: Williams  
Email Address: awmidge@atginternet.com  
Affiliation:

Subject: AB32  
Comment:

I hope that we will auction permits to emit CO2 rather than give them away. That way whatever the resulting procedes may be, they can be re-invested in carbon-reduction and equity measures where they will be most needed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 10:11:30

No Duplicates.

**Comment 61 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Shannon

Last Name: Dodge

Email Address: prettyprettypussycat@yahoo.com

Affiliation:

Subject: Do more to reduce Vehicle Miles Traveled (VMT)

Comment:

This plan does not do enough to reduce Vehicle Miles Traveled (VMT). In order to enable reduced driving, the Climate Change plan must require city and county governments to promote smart growth and more affordable housing. Dispersed land use patterns are costing Californians dearly, not only in gasoline but in our quality of life. Compact development with a mix of housing choices near jobs will enable Californians to drive less, spend less, breathe cleaner air, and spend more time with our families and contributing to our communities.

This plan bows too much to entrenched interests in city and county government who oppose compact development and affordable housing. It must be revised so that communities provide more choices allowing people to live closer to jobs and other amenities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 12:39:00

No Duplicates.

## **Comment 62 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

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

Subject: improvements to draft scoping plan  
Comment:

Congratulations to all on a job well done. Just a few comments on possible improvements:

The section on local government could use some expansion. Local governments impact climate change in many ways, from landfill management to forest protection and many others. Local governments already take many actions to reduce climate impact, some on their own initiative and others in response to state mandates. At a time of growing demands and shrinking revenues, local governments are looking to carbon trading as a possible source of revenue to fund these efforts. More information on their role in this process would be helpful.

There are also many resource management agencies other than local governments with the same issues and concerns. Waste management districts, water conservation districts and numerous others should be explicitly included in these plans.

Similarly, there are many non-profit and community-based organizations which are vital partners in the efforts to protect California's environment. Some discussion of their role in this system would be welcome.

The specific measures mentioned for reducing climate impact are modest and reasonable. Of course there are many other possibilities and still more which will be developed in the future. We should take care to enact a sufficiently flexible system to allow us to take advantage of emerging technologies and to react to changing circumstances.

Lastly, some care and consideration should be given to the development of the carbon trading market. This may have unforeseen consequences for California down the road, as we learned from the disastrous trade in energy futures and the recent meltdown of the housing market. Protections and regulation need to be implemented at not just the state level, but at the national and international level as well.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 12:48:39

No Duplicates.

**Comment 63 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: amy  
Last Name: davis  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/181-amydavis.pdf](http://www.arb.ca.gov/lists/sp-general-ws/181-amydavis.pdf)

Original File Name: amydavis.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:36:20

No Duplicates.

**Comment 64 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: daniel  
Last Name: marble  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/182-danielmarble.pdf](http://www.arb.ca.gov/lists/sp-general-ws/182-danielmarble.pdf)

Original File Name: danielmarble.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:37:56

No Duplicates.

**Comment 65 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Leonard

Last Name: Cook

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: cap and trade

Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/183-leonardcook.pdf](http://www.arb.ca.gov/lists/sp-general-ws/183-leonardcook.pdf)

Original File Name: leonardcook.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:39:55

No Duplicates.

**Comment 66 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Dennis

Last Name: Davis

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: Implementation of AB 32

Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/184-dennisdavis.pdf](http://www.arb.ca.gov/lists/sp-general-ws/184-dennisdavis.pdf)

Original File Name: dennisdavis.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:41:59

No Duplicates.

**Comment 67 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Liz  
Last Name: McDannel  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/185-lizmcannel.pdf](http://www.arb.ca.gov/lists/sp-general-ws/185-lizmcannel.pdf)

Original File Name: lizmcannel.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:48:42

No Duplicates.

**Comment 68 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: George

Last Name: Koch

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: AB 32

Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/186-georgekoch.pdf](http://www.arb.ca.gov/lists/sp-general-ws/186-georgekoch.pdf)

Original File Name: georgekoch.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:50:16

No Duplicates.

**Comment 69 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 70 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David  
Last Name: Thompson  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/188-davidthompson.pdf](http://www.arb.ca.gov/lists/sp-general-ws/188-davidthompson.pdf)

Original File Name: davidthompson.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:52:01

No Duplicates.

**Comment 71 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Carole

Last Name: Clum

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/189-caroleclum.pdf](http://www.arb.ca.gov/lists/sp-general-ws/189-caroleclum.pdf)

Original File Name: caroleclum.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:53:02

No Duplicates.

**Comment 72 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Genevieve  
Last Name: Tyler  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/190-genevievetyler.pdf](http://www.arb.ca.gov/lists/sp-general-ws/190-genevievetyler.pdf)

Original File Name: genevievetyler.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:54:08

No Duplicates.

**Comment 73 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: John  
Last Name: Castillo  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/191-johncastillo.pdf](http://www.arb.ca.gov/lists/sp-general-ws/191-johncastillo.pdf)

Original File Name: johncastillo.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:54:59

No Duplicates.

**Comment 74 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Donald

Last Name: Claps

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: AB 32

Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/192-donaldclaps.pdf](http://www.arb.ca.gov/lists/sp-general-ws/192-donaldclaps.pdf)

Original File Name: donaldclaps.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:55:48

No Duplicates.

**Comment 75 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Mary

Last Name: Patterson

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: AB 32

Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/193-marypatterson.pdf](http://www.arb.ca.gov/lists/sp-general-ws/193-marypatterson.pdf)

Original File Name: marypatterson.pdf

Date and Time Comment Was Submitted: 2008-07-23 13:57:51

No Duplicates.

**Comment 76 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 77 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Christine  
Last Name: Seghers  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: Implementation of AB 32  
Comment:

ARB has received 9 letters similar to this one (see attached)

Attachment: [www.arb.ca.gov/lists/sp-general-ws/197-iamveryconcerned.pdf](http://www.arb.ca.gov/lists/sp-general-ws/197-iamveryconcerned.pdf)

Original File Name: iamveryconcerned.pdf

Date and Time Comment Was Submitted: 2008-07-24 08:14:41

No Duplicates.

**Comment 78 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Christine

Last Name: Seghers

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: don't give away greenhouse gas permits

Comment:

ARB has received 27 of these letters (see attached)

Attachment: [www.arb.ca.gov/lists/sp-general-ws/198-verycloselyform.pdf](http://www.arb.ca.gov/lists/sp-general-ws/198-verycloselyform.pdf)

Original File Name: verycloselyform.pdf

Date and Time Comment Was Submitted: 2008-07-24 08:17:21

No Duplicates.

## **Comment 79 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Marcia

Last Name: Armstrong

Email Address: marmstrong@co.siskiyou.ca.us

Affiliation: Siskiyou Co. Bd of Supervisors - 5th Dis

Subject: Greenhouse emissions from wildfire and management impact

Comment:

Almost 100,000 acres have already been burned in Siskiyou County. The three large fires in Western Siskiyou County have been burning for more than a month and are no where near containment. They may burn into fall. At the time of this writing, 1,032,722 total acres have burned in California this summer and 717,304 or 70 percent were fires on federally managed land. \*

According to a study on greenhouse gas emissions from fire, the Angora fire was estimated to have emitted 46.2 tons of greenhouse gases per acre. (<http://www.calforestfoundation.org/pdf/FCEM-2.pdf> ) That would mean the California fires may have emitted 47.7 million tons of greenhouse gases so far. The EPA estimates that an average car driven 15,000 miles annually produces 6.5 tons of carbon emissions annually. That means that the fires could have produced emissions about the equivalent of 7.3 million cars. The study also indicated that if thinning, reduction of ladder and other fuels had been done in the forests where the Angora fires occurred, emissions could have been dropped to 12 tons per acre, instead of 46.2.

In 2006, the State of California passed AB 32, which requires the California Air Resources Board (CARB) to develop regulations and marketing mechanisms to reduce California's greenhouse gas emissions by 25 percent by 2020. Mandatory caps on emissions from industry and other sources will begin in 2012. A draft scoping plan is available now at <http://www.arb.ca.gov/cc/cc.htm> It would seem to me that a comprehensive and aggressive strategy to reduce fuels on our National Forests would not only protect the health and safety of forest communities, cost less in the long run in comparison to fire suppression, but make substantial strides in accomplishing greenhouse emission reduction goals under AB 32.

[\* Reference for citations  
[http://www.fire.ca.gov/index\\_incidents.php](http://www.fire.ca.gov/index_incidents.php)  
<http://165.221.39.44/state/5/>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-24 14:40:52

No Duplicates.

**Comment 80 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David  
Last Name: Spurlin  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/201-7\\_05\\_08\\_davidspurlin.pdf](http://www.arb.ca.gov/lists/sp-general-ws/201-7_05_08_davidspurlin.pdf)

Original File Name: 7\_05\_08\_davidspurlin.pdf

Date and Time Comment Was Submitted: 2008-07-25 11:22:45

No Duplicates.

## **Comment 81 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Julia Robinson

Last Name: Shimizu

Email Address: jrobinsonshimizu@breathela.org

Affiliation: Breathe California of Los Angeles County

Subject: Public Health Impact of Global Warming - Asthma and COPD

Comment:

BREATHE LA is a non-profit organization dedicated to clean air and healthy lungs in Los Angeles. One of our Center for Healthy Lungs Researchers, Dr. Margaret Nield, is conducting a study designed to improve quality of life for patients with lung disease by using skype technology to facilitate face-to-face communication between doctors and home-bound patients.

Dr Nield notes that COPD patients can also be affected by environmental factors. Air pollution, pollen and smoke from seasonal wildfires can all make it more difficult for COPD and Asthma patients to breathe. In California, and in other warm and tropical locations, increased temperatures lead not only to increased wildfires but to increased blooming and pollen triggering lung irritation and respiratory distress. Dr Nield sees a connection between Global Warming and the sharp rise in the incidence of asthma in children, "It is a global issue. The increase in warming and blooming of plants are part of the reason for increase in asthma cases. Focusing on environmental issues is only natural. There is a link to the natural in lung health and disease. In terms of COPD, primary causes include smoking and second hand smoke, but the whole other point is environmental. Global warming is the new AIDS."

The impact of suffering related to climate-related respiratory illness and shortness of breath is at epidemic levels. BREATHE LA urges public health assessment to include effects of Air Pollution. Our goal is a clean air future for Los Angeles, our hope is an effective implementation of AB 32 to ensure we achieve that goal.

[www.breathela.org](http://www.breathela.org)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-25 11:41:18

No Duplicates.



**Comment 82 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Roberta

Last Name: Lawson

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

Affiliation: CA Conference of Local Health Officers

Subject: Comments on AB 32 Scoping Plan

Comment:

Attached you will find a comments letter on the AB 32 Scoping Plan from the California Conference of Local Health Officers (CCLHO) under the signature of Ann Lindsay, MD, President, CCLHO.

Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/204-cclho\\_arb\\_comments\\_final\\_ab\\_32.pdf](http://www.arb.ca.gov/lists/sp-general-ws/204-cclho_arb_comments_final_ab_32.pdf)

Original File Name: CCLHO ARB Comments final AB 32.pdf

Date and Time Comment Was Submitted: 2008-07-25 15:04:13

No Duplicates.

**Comment 83 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mike

Last Name: De Blasi

Email Address: michaeldeblasi@yahoo.com

Affiliation:

Subject: Half-steps

Comment:

This bill is typical of American environmentalism. The most obvious method of reducing carbon emissions-increase development density, which will allow for fewer cars on the roads, protection of open space and farmland, increased mass transit availability and use and the health benefits that come from more active people-is also the step completely avoided because it might "infringe" on a person's right to live where they want no matter the costs to society.

These costs include road building, repair and maintenance costs, medical costs because of obesity and obesity-related illnesses, costs to mitigate poor air quality and mitigate habitat destruction, costs to build new and maintain existing infrastructure, etc.

Why not take care of the easy step of controlling sprawl first before we rely on the harder and more costly technological fixes?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-26 08:15:18

No Duplicates.

**Comment 84 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Tamiko

Last Name: Johnson

Email Address: tamiko.johnson@acgov.org

Affiliation: Healthy Eating, Active Communities Oak.

Subject: Climate Change Scoping Plan

Comment:

Please see the attached letter.

Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/206-heac\\_oakland\\_comments\\_on\\_carb\\_scoping\\_plan\\_\\_phlp-hoac\\_.7.28.08.doc](http://www.arb.ca.gov/lists/sp-general-ws/206-heac_oakland_comments_on_carb_scoping_plan__phlp-hoac_.7.28.08.doc)

Original File Name: HEAC Oakland comments on CARB Scoping Plan (PHLP-HOAC).7.28.08.doc

Date and Time Comment Was Submitted: 2008-07-28 12:43:42

No Duplicates.

**Comment 85 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lorraine

Last Name: Unger

Email Address: lorraineunger@att.net

Affiliation:

Subject: A few ideas that should be incorporated in AB 32 implementation guidelines

Comment:

Clean cars should be made more affordable. Incentives or rebates on such vehicles would be incentives for folks to buy them.

The Indirect Source Review Program that was adopted by the San Joaquin Valley APCD should be required throughout the entire state of California.

Energy produced from personal solar or wind generation should be purchased by the California utility companies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 16:37:12

No Duplicates.

## **Comment 86 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: jenny

Last Name: wilder

Email Address: jensoasis@aol.com

Affiliation:

Subject: general comments regarding CA Air Resources draft plan

Comment:

Thank you for the opportunity to submit comments. The air we breath is of such great importance that we cannot look lightly on the matter. It appears from past experience that some corporations, while looking at their bottom line, overlook the long term (and indeed short term) effect of their actions. Keeping this historic perspective, it makes sense to incorporate a provision that makes polluters pay for their emissions of greenhouse gases. By using the resulting revenues to promote clean energy and aid low-income consumers we would be increasing the probability of making choices that produce less pollution. We should also limit sharply and verify any offsets. The California program should not be linked to any states with weaker emission standards.

We can also do so much more when we look at statewide and local general plans. Include stronger measures to reform land use planning in ways that reduce vehicle miles traveled and incorporates alternative transportation such as walking and bicycling.

In California we are so fortunate to have the best available source of energy in abundance-the SUN. Many people would choose to use solar power for most of their household use if given the choice. For others it is not an immediate option. When given the choice, numerous consumers would switch to clean renewable power provided by the grid. We should promote and enable Community Choice Electricity Aggregation (CCA), which lets communities pool their buying power to generate clean power.

Numerous transportation choices can be powered technologies that have zero emissions. Auto companies should be making full use of those technologies and promoting them to the public. Mandate that auto companies sell hundreds of thousands of Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed level of 7500 ZEVs.

Much of our smog can be seen along the interstate and is produced by diesel trucking. Mandate that trucking and heavy equipment clean up their emissions.

Golf courses and homeowners use dirty and noisy maintenance equipment for their landscapes. Ban the use of equipment that pollutes the air (and is noisy) in favor of clean quiet machines. Mandate the use of zero emission equipment such as lawnmowers, edgers, weed wackers, blowers.

Waste is a huge issue for our communities, but has not been addressed. 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. Ban plastic bags for groceries unless biodegradable, ban styrofoam for take out in favor of degradable products.

Looking forward to cleaner air and to see the mountains once again in Southern California.

Sincerely,

Jenny Wilder

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 17:44:16

No Duplicates.

**Comment 87 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Carroll

Last Name: Nast

Email Address: cnast@infs.net

Affiliation: Sierra Club

Subject: Carbon tax, no offsets.

Comment:

Make polluters pay for their GGE and use the resulting revenues to promote clean energy and aid low-income consumers. Limit emissions sharply. Do not use carbon offset. Carbon offset has never produced a reduction of GGE that would not have been made without the payment. Additionality is impossible to prove. It is a dangerous distraction from the main task--significantly reducing GGE to avoid climate chaos. Carbon offsets allow us the illusion that we can buy our way out of this crisis.

Do not link California's program to any states with weaker emission standards.

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

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 22:00:58

No Duplicates.

## **Comment 88 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Gladwyn

Last Name: d'Souza

Email Address: godsouza@mac.com

Affiliation: www.catsmeo.org

Subject: comments regarding the California Air Resources Board's DRAFT Scoping Plan  
Comment:

- Use Cap and Dividend. 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. Give cities clean air credits so that they can implement strong policies such as a 20 mph speed limit across the town which will enable exiting technologies like Neighborhood Electric Vehicles. Cities should also enable complete streets for walking and bicycling.

- Promote and enable Community Choice Electricity Aggregation (CCA), which lets communities pool their buying power to generate clean power. Mandate that PG&E pay for overproduction at the Maximum Market Rate Referent.

- Mandate that auto companies sell hundreds of thousands of Zero-Emission Vehicles (ZEVs) by 2014, not the feeble proposed level of 7500 ZEVs. 20 mph cities can accomplish this without cost.

- Put Zero Waste front and center: increase recycling by businesses, mandate constructing 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 23:03:11

No Duplicates.

## **Comment 89 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Yichuan

Last Name: Pan

Email Address: ypan1@sbcglobal.net

Affiliation:

Subject: Plant-Based Diet Cures Global Warming

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: [www.arb.ca.gov/lists/sp-general-ws/211-20080729\\_to\\_arb.doc](http://www.arb.ca.gov/lists/sp-general-ws/211-20080729_to_arb.doc)

Original File Name: 20080729 to ARB.doc

Date and Time Comment Was Submitted: 2008-07-28 23:06:34

No Duplicates.

**Comment 90 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Tian  
Last Name: Harter  
Email Address: tnharter@aol.com  
Affiliation: Green Party Activist

Subject: Higher Gas Taxes should be part of the solution  
Comment:

Hello California Air Resources Board!

I am convinced that whatever regulations you propose people will start "looking for a way around that." On the other hand, if you simply raise fuel taxes, they will mutter and pay them and look for ways to use less fuel. That will have the desired outcome, and it may unleash a blast of creativity that will really find some great ways to use less energy. Don't be fuelish! Go for higher fuel taxes. At least a nickel or dime to start with...

Tian Harter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 23:34:16

No Duplicates.

## **Comment 91 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: jack  
Last Name: sanchez  
Email Address: alcamus39@hotmail.com  
Affiliation:

Subject: Making California Green  
Comment:

Please work to make the total energy in California generated by non-polluting sources such as wind, solar, and water. Water to remove non-functioning dam on California streams and rivers to return them to their natural state so fishes and aquatic creatures may once again thrive.

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.

Keep California from becoming another China.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 06:07:28

No Duplicates.



**Comment 92 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: kathleen

Last Name: bettencourt

Email Address: bettencourt@surewest.net

Affiliation:

Subject: Global Warming

Comment:

I support AB32 to fight global warming

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 07:38:27

No Duplicates.

## **Comment 93 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Carolyn

Last Name: Chase

Email Address: cdchase@movesandiego.org

Affiliation:

Subject: Cap & Trade details / 2020 vs. 2050 Focus

Comment:

Move San Diego is a non-profit organization working to create convenient, on-time, healthy, sustainable transportation throughout the San Diego region. Currently, our major focus is working with business, environmental, and government interests to create a transit system which is competitive in every way with private automobiles, and to reform land use planning to emphasize compact development conducive to transit, bicycling and walking.

Move San Diego has reviewed the Climate Change Draft Scoping Plan and are pleased to submit the following comments.

First, we are pleased to see that the Air Resources Board takes very seriously the ambitious timelines laid out in AB 32. It appears regulations and programs will be in place in a timely manner as prescribed by the law. We also commend ARB for due consideration of co-benefits of GHG regulation and the need to avoid disproportionately large impacts on underrepresented populations.

The Cap and Trade Approach

We agree with the document's basic framework, which entails the creation of a new cap and trade system for GHG, managed in cooperation with the other state members of the Western Climate Initiative. This seems the most sensible approach. We urge you to consider every aspect of the launch of the cap and trade system, such that polluters do not receive windfall profits, at the expense of consumers, and that any revenues from the system be used in part to reduce the costs to members of the public most disadvantaged by increased prices that may result from regulation. This can best be accomplished by auctioning allowances or credits, and distributing these revenues to low income groups via public transit enhancements, needs-based rebates on high-efficiency appliances, etc.

2020 vs. 2050 Focus

The attention of the Plan is focused almost exclusively on the 2020 greenhouse gas (GHG) reduction target of approximately 30% reduction from business as usual, ignoring the 80% reduction below 1990 target for 2050. Very few places in the Plan is there consideration of launching initiatives that will have a small benefit by 2020 but a substantial benefit by 2050. This is a significant oversight, as it especially undervalues the slow,

steady and possibly irreversible increase in emissions resulting from low density sprawl development.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 08:03:28

No Duplicates.

**Comment 94 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Amy

Last Name: DuBois

Email Address: amy.dubois@askintl.com

Affiliation:

Subject: Greenhouse gas emission

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 08:34:53

No Duplicates.

## **Comment 95 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Caroline

Last Name: Snyder

Email Address: cgsnyder@post.harvard.edu

Affiliation: Professor Emeritus RIT

Subject: methane collection from landfills

Comment:

I am vice-chair of the NH chapter and also serve on the Zero Waste Committee. I do NOT agree with my colleagues on this committee that more methane is always released to the atmosphere when this gas is collected as a source of renewable energy. This may be true of some badly managed older landfills, but state-of-the-art landfill construction, management, and cover design, as well as data from FIELD TESTS published in the peer reviewed scientific literature indicate that up to 90% of landfill generated methane CAN be captured as a renewable form of energy. It is being done in many parts of the country. Here in NH, methane from our largest landfill is piped to the University of NH campus as a primary source of renewable energy for the campus. In Greensboro NC methane from a landfill helps run a textile mill. SAVING MONEY AND DECREASING FOSSIL FUEL USE, , thus truly decreasing greenhouse gases.

When formulating policies, it might be prudent for the SC to consult with recognized experts in this field, rather than to depend only on theories generated by someone whose training is in economics and who has never published a peer reviewed paper on this topic.

For example, the CA Air Resources Board might want to look at Chapter 10 of the International Panel of Climate Change, a group which, together with Al Gore, received last year's Nobel Peace prize.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 08:53:27

No Duplicates.

**Comment 96 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Patricia

Last Name: Sarvis

Email Address: eyeries@goldrush.com

Affiliation:

Subject: Comments on Draft Rules for AB 32

Comment:

Please strengthen AB 32 rules in the following ways:

- 1) Charge polluters for their pollution and invest the money in renewable energy development.
- 2) Do not link the CA program with those of other states with weaker standards.
- 3) Have stronger land-use requirements that reduce vehicle miles traveled. Without reducing VMT, the program will fail.
- 4) Require recycling and other waste-reduction programs by businesses.
- 5) Include alternative possibilities that would go beyond 33% of our energy being produced by clean sources by 2020, and meet Al Gore's challenge of 100%.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 09:01:11

1 Duplicates.

**Comment 97 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sherry

Last Name: Boschert

Email Address: sherry.boschert@gmail.com

Affiliation:

Subject: Strengthen the Scoping Plan

Comment:

Please strengthen the Scoping Plan in the following ways:

- Use "cap and auction," not "cap and trade." Make polluters pay.
- Reduce vehicle miles traveled through stronger reform of land use planning.
- Through the state's weight behind Community Choice Aggregation of Electricity so we can pool local buying power and choose clean power.
- Specifically mandate with the Scoping Plan (not just in separate programs like the ZEV or Pavley programs) that auto companies offer hundreds of thousands of zero emission vehicles by 2014 (or the emissions equivalent).
- Embrace and promote the concept of zero waste in all sectors by mandating increased recycling, composting, and charging producers with responsibility for final disposition of their products.

Attachment:

Original File Name:

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

No Duplicates.

## **Comment 98 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: James

Last Name: Tuleya

Email Address: jtuleya@yahoo.com

Affiliation:

Subject: Comments on CARB Draft Scoping Plan

Comment:

While CARB's Draft Scoping Plan includes a number of strong measures, the draft needs significant strengthening before it will be up to meeting the very tough challenge of combating global warming. Below are some suggestions that I think should be given a closer look and consideration:

- 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 constructing facilities to compost all green waste, and require producers to take responsibility for the end-of-life disposition of their products.

Also, I am concerned that California's "Renewable Energy Standards do not "exclude" burning mixed garbage as renewable energy. Until much stronger efforts on reuse and recycling are adopted to minimize material in landfills in the first place, I do not support expansion of efforts on Waste-to-Energy (WtE). Concerns re WtE include air pollution, e.g., dioxins, no net energy creation and the damage to recycling infrastructure when local governments are locked into long term supply contracts making the materials not available for recycling. The current CARB scoping plan does not define what would be in California's Renewable Energy Portfolio or Standards. It should.

The current CARB report also advocates for making landfills sources of methane for energy generation. Trying to maximize methane generation from landfills in sufficient concentrations to become viable as an energy source will increase the amount of fugitive releases of methane and volatile organic compounds that attach themselves to methane resulting in increasing methane in

the atmosphere. Methane is 25 times more damaging the atmosphere than carbon dioxide. If there is any chance that more methane could be released, the Precautionary Principle says do no harm, so the Scoping plan should do more research on this area rather than advocating a change that at minimum is counterproductive, and at worst could be devastating.

Thank you.

Sincerely,

James Tuleya  
Sunnyvale, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 12:34:16

No Duplicates.

## **Comment 99 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Dana

Last Name: McPhall

Email Address: time2actisnow@aol.com

Affiliation:

Subject: Strong Measures Needed To Ensure Emission Reductions

Comment:

Dear CARB,

Thank you for the opportunity to submit comments regarding the Draft Scoping Plan. I appreciate the hard work of the California Air Resources Board (CARB) in implementing AB 32, and ensuring CA significantly reduces its greenhouse gas emissions.

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 Plan needs significant strengthening before it will be up to meeting the challenge of combating global warming. My comments focus on passing regulations and/or laws that mandate specific actions be taken by industry in order to achieve large-scale emission reductions.

Accordingly, I'm making the following suggestions:

- Make polluters pay for their emissions of greenhouse gases, using the resulting revenues to promote clean energy and aid low-income consumers.
- Sharply limit and verify any offsets. Do not link California's program to any states with weaker emission standards.
- Set a goal of 100% renewable electricity by 2020 through legislation or regulation.
- Promote and enable Community Choice Electricity Aggregation (CCA), which allows communities to pool their buying power to generate clean power.
- Include stronger measures to reform land use planning in ways that reduce vehicle miles traveled.
- Mandate that auto companies sell hundreds of thousands of Zero-Emission Vehicles (ZEVs) by 2014, not the woefully inadequate level of 7,500 ZEVs proposed by your plan.
- 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.

I hope these critical measures become a part of the final Scoping Plan to be released later this year. Thank you again for your time and consideration.

Sincerely,

Dana McPhall

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 13:22:48

6 Duplicates.

## **Comment 100 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Roberto

Last Name: Amadei

Email Address: ramadei1@alice.it

Affiliation: Chemical & Energy Development srl

Subject: AB 32

Comment:

We are pleased to attach the description of a measure to Well-To-Wheels reduce Greenhouse Gas emissions (the report "An economic and environmental gasoline"), in its turn containing two enclosures.

The measure, that can be carried out now, complies with the maximum benefits for California, as defined by the AB 32 bill.

In fact

- the measure reduces considerably the GHG emissions both in the gasoline production and consumption segments,
- this reduction does not happen at cost but with a (huge) profit per ton of GHG reduced and
- the measure also reduces all types of the toxic or harmful emissions, consequently also improving public health and environment.

The above report considers and figures up the profit carried out by the measure. We observe yet that this profit is a direct, cash one. The report does not consider, it neglects, the economic value of the yet accomplished avoided damages, of the avoided deaths, of the improved health et cetera.

According to the Climate Change Draft Scoping Plan, Table 1, page 8, by applying to 10 California refineries even the bare carbon dioxide reduction carried out by this measure technology for the report 180,000 b/cd case study refinery, hence by neglecting the reduction of the other greenhouse gases the technology obtains, the measure accomplishes a CO2 emission reduction over the 2002-2004 average emission of  $3.95 / 469 = 0.84 \%$ .

Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/228-ab32.rar](http://www.arb.ca.gov/lists/sp-general-ws/228-ab32.rar)

Original File Name: AB32.rar

Date and Time Comment Was Submitted: 2008-07-30 06:44:23

No Duplicates.

## **Comment 101 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Chris

Last Name: Fitz

Email Address: cfitz@mclw.org

Affiliation: Exec, LandWatch Monterey County

Subject: Climate Change Draft Scoping Plan

Comment:

LandWatch Monterey County appreciates the opportunity to provide comments on the Climate Change Draft Scoping Plan. LandWatch is dedicated to preserving Monterey County's economic vitality, high agricultural productivity, and the health of our environment by encouraging greater public participation in planning. Our comments follow:

### Land Use

Vehicle miles traveled (VMT) is projected to increase by 66% between 2006 and 2030 ("2007 California Motor Vehicle Stock, Travel, Fuel Forecasts", Caltrans, May 2008). This increase is significantly greater than forecasts for population growth during the same period of 32%. Travel growth is related to greater car ownership, increased trip-making and longer commutes. All these issues are fundamentally related to land use and urban sprawl.

Reducing travel would be addressed by Local Government Actions and Regional GHG Targets. It is estimated that this voluntary measure would reduce emissions by 2 MMTCO<sub>2</sub>E or 1% of the total recommended reductions. The Scoping Plan should assign more emission reductions to this sector. Additionally, emission reduction targets should be enforceable through regional planning efforts or indirect source review rules that are legally enforceable through air pollution control districts.

The Scoping Plan should also include greater funding from State transportation funds for public transit and other forms of alternative transportation. Transit funding from government funds has continually declined throughout the years - a trend that needs to be reversed if California is to reduce single occupancy travel and reduce GHG emissions.

### Sustainable Forests

The Sustainable Forests measure shows a 5 MMTCO<sub>2</sub>E reduction. Emissions reductions are to be achieved through such measures as forest management and protecting forest land using the CEQA process. Regarding the latter, the Plan should require amendments to CEQA Guidelines to require offsets when forest lands are replaced by emission increasing activities, i.e., development.

### Agriculture

Emission reductions for agriculture are voluntary. Increased water efficiency, greater reliance on organic farming and reduced use of petroleum based pesticides and fertilizers are areas that should be addressed by the agricultural sector. Additionally, enforceable emission reductions should be required of this sector.

Thank you for the opportunity to comment on the Draft Plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 07:43:07

No Duplicates.

**Comment 102 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michael  
Last Name: Poulsen  
Email Address: MSPoulsen23@aol.com  
Affiliation:

Subject: AB 32, the California Global Warming Solutions Act of 2006  
Comment:

I am writing to you to encourage the adoption of stricter environmental standards in regards to AB 32, the California Global Warming Solutions Act of 2006. Especially in light of recent news of further Arctic ice erosion and the Bush administration's illegitimate interference in the EPA rejection of California's improved carbon emission restrictions, it is past time to make a strong stance for the environment, our economy and our future. Thank you,  
Michael

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 09:57:08

No Duplicates.

## **Comment 103 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Chris

Last Name: Cone

Email Address: cone@sonic.net

Affiliation:

Subject: Cap and Trade/Carbon Fees

Comment:

The Draft Scoping Plan does a fine job of addressing solutions to reduce greenhouse gas emissions. Regarding the Cap and Trade plan, however, I would like to suggest the following revisions to ensure the plan will provide the best results and avoid loopholes that could undermine its performance.

CAP AND DIVIDEND, NOT CAP AND TRADE

These recommendations are:

- 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.

CARBON FEES PLAN

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: 2008-07-30 10:24:50

No Duplicates.

**Comment 104 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Harry  
Last Name: Love  
Email Address: cseghers@arb.ca.gov  
Affiliation: Kern Audubon Society

Subject: AB 32 Implementation  
Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/232-7\\_11\\_08\\_harrylovekernaudobonsociety.pdf](http://www.arb.ca.gov/lists/sp-general-ws/232-7_11_08_harrylovekernaudobonsociety.pdf)

Original File Name: 7\_11\_08\_harrylovekernaudobonsociety.pdf

Date and Time Comment Was Submitted: 2008-07-30 11:33:00

No Duplicates.

## **Comment 105 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Dwight

Last Name: Sims

Email Address: dsims@sonic.net

Affiliation:

Subject: Cap and dividend

Comment:

I think it is especially important for the State to set aggressive goals to increase renewable energy and reduce vehicle miles travelled. I particularly support a cap and dividend approach. 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.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 12:20:06

No Duplicates.

## **Comment 106 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: elizabeth  
Last Name: herron  
Email Address: ehsalmon@earthlink.net  
Affiliation:

Subject: AB32 & Cap Auction Dividend  
Comment:

Dear CARB,

Thank you for your work on the Draft AB32 Scoping Plan, especially in its goals for California to increase renewable energy and reduce vehicle miles travelled. I am writing to advocate a lesser talked about implementation plan for AB32: Cap Auction Dividend. I urge you to emphasize this plan in your Final Scoping Plan.

I urge you to support the auction of 100% of the permits under the cap. I firmly believe that polluters should be made responsible for their emissions. I disagree with the issuance of free permits at any time. No free permits to underwrite coal and delay the essential development and availability of cleaner energy. I further urge that the Final plan identify the recipients of the funds from permit auction as The Citizens of the State of California, to whom individual monthly or bi-annual dividend checks should be issued to cover the increasing costs of energy, which will naturally be passed on to consumers.

I completely support and applaud CARB's proposal that fees for carbon be levied against fossil fuel companies and the diversion of those funds as additional monies for the resource and development of clean energy, green jobs and energy efficiency education.

California's own Public Health officials have said we may experience heat waves as long as three months in California by 2010. Let's change the way things are done as quickly as we can, before the already devastating environmental costs grow beyond remediation. A warming climate already means the loss of significant biodiversity and extreme conditions threatening human life in large areas of the planet.

Elizabeth Herron, PhD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 13:04:47

No Duplicates.

**Comment 107 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rex  
Last Name: Hime  
Email Address: rexhime@cbpa.com  
Affiliation: CBPA

Subject: Comments on ARB Scoping Plan  
Comment:

Please find our comments attached - thank you

Attachment: [www.arb.ca.gov/lists/sp-general-ws/235-cbpa\\_arb\\_scoping\\_comments.docx](http://www.arb.ca.gov/lists/sp-general-ws/235-cbpa_arb_scoping_comments.docx)

Original File Name: CBPA ARB Scoping Comments.docx

Date and Time Comment Was Submitted: 2008-07-30 13:34:52

No Duplicates.

**Comment 108 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: mary  
Last Name: giacoletti  
Email Address: mpowergiacoletti@prodigy.net  
Affiliation: Clean Air Revival

Subject: Particulate Pollution  
Comment:

Not enough attention is being paid to the enormous "burden" of pollution which results from "casual" wood burning. Every community in California is impacted by deliberate smoke. Vehicle pollution is almost insignificant in comparison (some interesting studies have been done by Stanford on the level of pollutants generated by traffic as opposed to those generated by fireplaces). While I applaud efforts made to ameliorate the effects of diesel engines, I think a similar program targeting the pointless practice of burning wood should be adopted as soon as possible. There is a great deal of ignorance about the subject and almost no education.

Mary Giacoletti

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 13:57:43

No Duplicates.

## **Comment 109 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Mark

Last Name: Hall

Email Address: mhall@environmentalpower.com

Affiliation: Environmental Power Corporation

Subject: Comments on the Draft AB 32 Scoping Plan

Comment:

Environmental Power applauds the California Air Resources Board (ARB) for recognizing the benefits of anaerobic digestion and biogas in the Climate Change Draft Scoping Plan ("Draft Plan"). Methane is a potent greenhouse gas (GHG) and methane emissions from agricultural livestock and organic waste contribute to global climate change. By creating incentives for changes in manure management practices, wastewater treatment processes, increased source separation of organics from methane-producing activities, and encouraging the capture and beneficial use of biogas as a renewable resource, ARB can achieve greenhouse gas emission reductions.

We agree that biogas produced from livestock-based anaerobic digesters are already an important contributor to the State's efforts to produce 12 percent of California's retail electric load from renewable resources. Efforts to increase the target RPS to 33 percent will require an even greater contribution from this resource. However, anaerobic digestion is only one of a broad range of options of exists to encourage reductions from this sector and we support the ARBs conclusion that providing economic incentives such as marketable emission reduction credits, favorable utility contracts, or renewable energy incentives will stimulate the implementation of various captured gas methods and methane reduction and that efforts to mandate the use of digesters would not be an appropriate path. The initiative undertaken by ARB and the California Climate Action Registry on developing a livestock digester protocol already assures that digester projects that do get constructed can quantify their emission reductions in a verifiable manner that ensures the integrity of any offsets that might be used for compliance obligations in other sectors.

We would like to draw ARB's attention to the potential for additional methane capture and beneficial use in wastewater treatment systems. Projects undertaken to reduce methane emissions from these operations should also be provided the opportunity to create a tradeable offset which can be used by other sectors to meet compliance obligations.

Anaerobic digestion should also be incorporated into the recycling and waste initiatives in the Draft Plan. The technology we employ can also use food industry and related agricultural product waste streams that are separated from other municipal waste streams to produce additional biogas. This co-digestion process can reduce GHG emissions compared to current practices when there are sufficient incentives.

One specific issue that needs further attention in the Draft Plan is the manner in which carbon fees are assessed. As laid out in the Draft Plan, the fees would be levied on natural gas flowing through any of the state's seven interstate natural gas pipelines.

As some of the natural gas that will flow through those systems will be biogas conditioned to pipeline quality standards and will be GHG-free, we suggest that a mechanism by which ARB could track "green" gas (renewable gas) so that renewables are not assessed the carbon fee be created.

Environmental Power is pleased that ARB has included biogas as a solution in the Draft Plan. Biogas deserves to be part of the comprehensive approach to climate change, and will serve as a valuable resource in both GHG emission reduction and renewable energy generation. We look forward to working with the State of California in realizing its goals of reducing overall carbon emissions, improving the environment, reducing dependence on oil, diversifying energy sources, saving energy, and enhancing public health while creating new jobs and enhancing growth in California's economy.

Mark Hall  
Senior Vice President  
Environmental Power Corporation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 14:09:12

No Duplicates.

## **Comment 110 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Priority Concerns: Draft Scoping Plan  
Comment:

Kudos to CARB's staff for a Scoping Plan that's moving in the right direction. But it needs strengthening before completion in November.

CARB's challenge is to 1) support solutions that are truly commensurate with the scale of the problem; 2) insist that barriers to climate protection and carbon reduction be clearly identified, understood and removed; 3) resist attempts by politicians and special interests to water down the science and weaken the Plan; 4) refuse to be sidetracked by false paths, phony solutions, green-scamming and dirty-industry foot-dragging.

Seven crucial GHG actions to improve CARB's plan:

- 1) Make any cap and trade 100-percent auction -- with revenues going to scale up renewable clean energy, not to a general public payout, keeping offsets narrowly limited and solidly verified. Don't allow the Western Climate Initiative to dilute or compromise California's own, better solutions.
- 2) Frame cap-and-auction as just one tool among market mechanisms. Bring forward the other tools more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda;
- 3) Give the 33-percent renewable electricity standard by 2020 the force of law, either through legislation or regulatory action or both. It's not enough just to recommend that been done and hope it will occur.
- 4) Strongly promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reductions;
- 5) Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins and electric cars) beyond CARB's currently too low projected levels;
- 6) Greatly strengthen the too-modest and overly-timid land use and agricultural sections of Plan
- 7) Include and support ALL ETAAC's recommendations on zero waste and recycling, not just a few, as well as Extended Producer Responsibility (EPR);

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 15:47:18

No Duplicates.

## **Comment 111 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Gordon

Last Name: Mann

Email Address: gordon@sactree.com

Affiliation:

Subject: Use of urban trees to achieve greenhouse gas reductions

Comment:

Thank you for including trees in greenhouse gas reductions. There are 4 areas that affect how trees will achieve reduction:

Forests

Solar

Local government actions

Energy

The inclusion of trees in the AB32 plan can be enhanced to provide a great return on investment.

Trees will reduce greenhouse gas reductions through shading and energy conservation, carbon sequestration, encouraging more foot and bicycle traffic, urban wood utilization, and reduced ambient air temperatures and heat islands.

A conflict with solar exists by encouraging or requiring individual solar systems on homes. Solar power unless the sole power source for a building will not be viable during a power failure. The use of solar panels conflicts with trees shading the building that will reduce the need for energy. The solution is to create solar farms or surrogate solar sites on top of parking structures, tall buildings and large footprint buildings that cannot otherwise be shaded. Along with providing a great location for the solar panels, the roofs and top level will receive shade, reducing building temperatures.

The state can create incentives or coordinate urban wood utilization to improve the viability of this market and enhance carbon sequestration.

There are other environmental benefits from urban trees in stormwater interception, air quality, public health, and retail sales and property value increases that increase the return on urban tree investment.

There are many opportunities to increase tree canopy in underserved communities that provide additional social benefits to the greenhouse gas reductions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 15:54:18

No Duplicates.

## **Comment 112 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: gerald  
Last Name: cauthen  
Email Address: cautn1@aol.com  
Affiliation:

Subject: GHG Reduction - General  
Comment:

In view of the State's growing population, achieving the needed GHG reductions will take a very strong and comprehensive program.

Unfortunately it appears CARB is counting on the improved efficiency of cars and trucks to adequately reduce transportation's part of the GHG production program...a very risky approach.

What's also needed is:

- o better and more transit-oriented California land use practices,
- o steady improvement in the non-automotive forms of travel,
- o incentives designed to reduce VMT.

These factors seem to have been overlooked in CARB's planning.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 16:28:32

No Duplicates.

# Comment 113 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Big-Ticket Items that CARB's Plan Should Not Neglect  
Comment:

Comments of Sierra Club California Energy & Climate Committee,  
California/Nevada Regional Conservation Committee to California  
Air Resources Board

Recommendations Regarding Implementation of AB 32 to Achieve  
Reductions in Greenhouse Gas Emissions

May 2008

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Introduction Thank you for this opportunity to assist the California Air Resources Board in developing a Scoping Plan to meet the Greenhouse Gas emissions reductions mandated by AB 32. In the sections below, Sierra Club California highlights emission reduction strategies by selecting one or two innovative programs in each of four sectors -- Land Use, Transportation, Utilities, and Waste -- that we believe are most likely to have positive effects in reducing both conventional 'criteria' pollutants as well as greenhouse gas emissions. There is an effort to approach the problems holistically, to see the interaction between sectors, such as transportation and utilities or land use, and also to consider solutions that work simultaneously for the environment and the economy. Each strategy is directed toward three groups of stakeholders - wholesalers/manufacturers, retailers/providers, and consumers/ ratepayers/residents. Afterwards, we describe and comment on two market-based incentives that are currently the subject of much public debate.

Local, state, and federal governments in the US are experiencing a growing recognition of the potential environmental, social, political, and financial benefits inherent in adopting the goal of near-term emissions reductions. The urgency of achieving GHG reductions in the near future gives ARB an unprecedented opportunity to strengthen liaisons among the various agencies and planning divisions. ARB has the potential to simultaneously accomplish goals along three dimensions: decrease in GHG emissions, further clean-up of criteria air pollutants, and

reduced reliance on imported conventional fuels. Toward these goals, we propose the adoption of the programs and incentives described below.

Urban planning that reduces driving times and avoids suburban sprawl has been recognized as an important strategy for reducing GHG emissions across the US. In the recently published Urban Land Institute's Growing Cooler: The Evidence on Urban Development and Climate Change (2008), the authors warn that if sprawling development across the US continues to fuel growth in vehicle use, the projected 59 percent increase in the total miles driven between 2005 and 2030 will overwhelm expected gains from vehicle efficiency and low-carbon fuels. Even if the most stringent fuel-efficiency proposals under consideration are enacted, notes co-author Steve Winkelman of the Center for Clean Air Policy, "vehicle emissions still would be 40 percent above 1990 levels in 2030 - entirely off-track from reductions of 60-80 percent below 1990 levels by 2050 required for climate protection." Clearly, urban/suburban planning decisions go hand-in-hand with programs to reduce GHG emissions in the transportation sector (see <http://www.smartgrowthamerica.org/gcindex.html>). Traditionally, land use decisions have been local prerogatives, and 18 California counties are already using "UPlan", a "micro-economic integrated land use and transportation model" advocated by the Information Center for the Environment at UC Davis. It is on a regional scale, however, that California land use policies can be meaningfully linked with more effective mass transportation alternatives. Traditionally, transportation planning agencies have not considered land use to be within their effective scope. However, the recognition that a regional approach is critical for changing travel patterns and decreasing GHG emissions has led four metropolitan regions -- San Francisco, Sacramento, Los Angeles, and San Diego - to create Regional Blueprints. The Regional Blueprint Planning process is designed to build consensus on practical solutions for managing growth. In total, nine regions, encompassing 95% of the state's population, are actively engaged in Blueprint Planning. This convergence presents an unprecedented opportunity for incorporating innovative mass transit programs and infrastructure into a visionary statewide transportation network that provides attractive alternatives to current driving practices. (see [http://climateplanca.org/climateplan\\_brochure.pdf](http://climateplanca.org/climateplan_brochure.pdf)).

Accomplishing these goals will require moving beyond "business as usual" approaches, and it will be very useful if CARB can develop a working relationship with governing bodies and appropriate staff in the state and regional transportation planning agencies. The aim, in our view, should be to create plans as well as meaningful performance metrics for meeting greenhouse gas reduction goals, and integrating these into the regular decision processes of the planning agencies. Directors of these agencies need to be held responsible for implementing the appropriate metrics and meeting goals. At the state level, Caltrans' Division of Transportation Planning has been directed- "through active engagement with all segments of the population as well as critical stakeholders in the community, business interests, academia, builders, [and] environmental advocates"-to "foster a more efficient land use pattern that supports improved mobility and reduced dependency on single-occupant vehicle trips." For the third year, Caltrans is offering monetary grant funding for "regional collaborative decision-making" that will lead to providing consumers with more transportation choices and will

"[r]educe costs and time needed to deliver transportation projects through informed early public and resource agency involvement." (see <http://calblueprint.dot.ca.gov/>). A group of consultants who have conducted studies pursuant to Regional Blueprint directives have calculated that Vehicle Miles Traveled (VMT) have seen a 45% reduction, compared to the regional average, in households located within a 1/2 mile of transit stations, and a 21% reduction for households located between 1/2 and 1 mile of transit stations. Mass transit is particularly well suited for shorter trips, which cause a disproportionately large percentage of total GHG vehicle emissions. Often-cited studies have shown that 55-65% of all trips are less than 3 miles, and up to 80% are less than 5 miles. (See [http://www.dot.ca.gov/hq/tpp/offices/opd/past\\_files/Presentation\\_24Ds.pdf](http://www.dot.ca.gov/hq/tpp/offices/opd/past_files/Presentation_24Ds.pdf)).

Mass transit options should be accessible, reliable, and reasonably comfortable in order to provide realistic alternatives to the familiar allures of personal vehicle use. With a few notable exceptions, budget allocations for mass transit infrastructure in California have far under-paced government funding for state roads and highways. Policies in the Transportation sector that have favored passenger vehicles and cargo trucking have resulted in serious traffic congestion, high accident and injury rates, alarming levels of GHG emissions, and problematic waste issues in the manufacturing and disposal of cars and trucks. The convergence of the Regional Blueprint Planning directives and the AB 32 reduction goals affords an unprecedented opportunity to 'fast-track' design and development of regional mass transit infrastructure, including Bus Rapid Transit programs, expansion of existing Amtrak lines, High-Speed Passenger Rail systems, electrified commercial transport, and accessible siting of transit stations for neighborhood inter-modal connections. At the same time, we need to begin thinking in terms of the 'true costs' of driving passenger vehicles, and reduce current incentives to driving, thereby discouraging the 'car-centric' way of life that has been adopted in California and throughout the country. Several of these disincentives have already been discussed and recommended in the February 2008 report by ARB's Economic and Technology Advancement Advisory Committee (ETAAC).

Bus Rapid Transit (BRT) is an innovative program that will require minimal additional infrastructure, and will have the multiple effect of enhancing service capacity within the existing highway system while reducing VMT and GHG emissions levels. Bus Rapid Transit integrates bus with rail transit, while also making use of existing High Occupancy Vehicle (HOV) lanes, priority at traffic lights, and several other technologies to improve mobility and efficiency. The Director of Caltrans has asserted: "It is our policy to transport the maximum number of people as efficiently and cost effectively as possible through comprehensive, multimodal 'system management'...[BRT] is emerging as one of the most attractive investment choices, especially since our State Highway System presents tremendous opportunities to quickly implement BRT services. With one of the most extensive networks of High Occupancy Vehicle (HOV) lanes in the world, California already has a foundation in place to support the development of BRT operations in our urban areas." (See: <http://www.dot.ca.gov/hq/MassTrans/Docs-Pdfs/BRT-Handbook-030706.pdf>). The goal of maximizing usage and insuring cost-effectiveness is also important for realizing greenhouse gas reduction in other transportation modes, such as rail, bicycle and pedestrian. ARB

can play an effective role in moving CALTRANS and other transportation agencies to expand the role of these metrics, and promote effective implementation of transportation options that are too often short-changed in the planning and budget process. In addition, ARB should develop policies that assist rail and transit agencies to move away from dirty diesel fuel to cleaner energy sources. This will improve the environment while making public transportation a much more attractive option for the public. Developing new models to more accurately forecast emissions is a critical step to identifying and implementing regional land use strategies for GHG pollution reduction. The Sacramento Area Council of Governments (SACOG) has created one of the most sophisticated models in the country, and recently used it to review a large-scale development proposal. The Blueprint process resulted in a scenario with 33% less water consumption, a 26% decrease in average vehicle travel per new household, and a 7% reduction in travel time spent in heavy congestion when compared to existing land use patterns. SACOG is now providing resources and incentives to help other cities realize this vision (see Base Case and Draft Preferred Scenario: Key Statistics, [www.sacog.org](http://www.sacog.org)). The CEC's Integrated Energy Policy Report (2007) states that the Blueprint Planning program is in the early stages of implementation, and will require technical, financial, and regulatory assistance to meet its goals of reducing climate and energy impacts throughout the state's metropolitan areas. The Report encourages state agencies to assist local governments in reducing energy use and GHG emissions. This is one crucial area where ARB can facilitate energy-efficient land use development patterns by supporting the incorporation of statewide mass transit planning into Regional Blueprints processes. Coordination of efforts with Caltrans, Amtrak railways, and BTH (California Business, Transportation, and Housing Agency) could result in dramatic improvements in the availability, comfort, and cost of neighborhood mass transit stations, metropolitan-intercity rail services, and bus rapid transit systems.

Transportation Sector: Electrification of Commercial, Public, and Private Transport Summary: A large number of private and public stakeholders around the world recognize that battery electric vehicles (BEVs) are the most feasible candidates to meet imminent needs for Zero Emission Vehicle (ZEV) production and availability. Near-term electrification of all modes of transportation - commercial, public, and private - is an essential component for the implementation of AB 32 goals. The urgency of reducing GHG emissions should guide ARB to create a Battery Electric Vehicle Partnership for fulfilling near-term reductions, while realistically relegating the role of the Hydrogen Fuel Cell Partnership to long-term reductions.

Transportation is the largest contributor to GHG emissions in California, currently measured at approximately 40% of the total. It is urgent that programs in this sector be scaled up in a serious way in order to contribute to the implementation of AB 32 requirements. The February 2008 report by ARB's Economic and Technology Advancement Advisory Committee (ETAAC) identifies three major areas for "rethinking transportation to lower demand and carbon": changes in private and commercial driving practices, cleaner fuels, and new technologies. In the area of driving practices, the report makes several worthwhile suggestions relating to state agencies' revisions of roadway designs, transportation planning metrics, and land use programs to optimize traffic patterns. The report also focuses on the implementation of

regulations that encourage drivers to reduce their length of miles traveled, the number of trips taken, and time spent in congested traffic, while promoting an increase in carpooling and mass transit for daily commutes. Recognizing the large percentage of GHG emissions contributed by commercial trucking, freight, and cargo services throughout California, the ETAAC Report recommends that ARB extend its partnership with state transportation agencies to plan commercially viable electric rail systems that would help replace reliance on standard diesel trucks and trains. Sierra Club California appreciates the attention that ARB has already given to anti-idling laws for the trucking industry, the promotion of on-board and off-board electrification at rest areas and truck stops, and the regulation of diesel emissions for buses and waste collection vehicles. ARB has also wisely turned its attention to the diesel emissions of ships and trucks at California marine ports. However, such regulations targeting diesel and gas engine emissions are transitional in nature, given the imperative of achieving system-wide redesigns of vehicle propulsion. In order to offset the environmental impact of population increases and anticipated growth in the Transportation sector, it is essential that new technologies be researched, developed, and adopted by government-manufacturer partnerships in an expedited manner. The two leading technologies that are being developed for replacing conventional gas engines are electric- and hydrogen-powered vehicles. Both technologies are able to power zero-emission vehicles (ZEVs), depending upon the sophistication of their designs and their methods of power-source generation. Sierra Club California is joined by a consortium of environmental and health organizations that is advocating the near-term production and availability of ZEVs as an essential component for the implementation of AB 32. The overwhelming consensus is that battery electric passenger vehicles (BEVs) are the most feasible candidates to meet imminent needs for ZEV availability. Future electrification of all modes of transportation—commercial, public, and private—is indispensable for meeting longer-term reduction targets. The first phase of ARB's ZEV program has focused on private passenger transport, and considered only criteria pollutants. However, in relation to meaningful progress toward GHG reduction goals, a substantial shortfall exists for this first phase of electrification in the number of vehicles proposed. In its March 2008 ZEV revisions, ARB failed to increase the number of ZEVs to be produced (which had been 25,000 in 2012-14 and 50,000 in 2015-17). Instead, these inadequate requirements were further reduced to a paltry 7,500 ZEVs in 2012-14 by allowing "near zero" emission vehicles (plug-in hybrids and hydrogen internal combustion engines) to substitute for "pure" ZEVs. Although ARB claims that its strategy has "appropriately considered the state of technology, market factors, economic impact, and our mission", Sierra Club California respectfully disagrees and believes that there should be hundreds of thousands of ZEVs on the road in that timeframe. The three main considerations for ARB's decision making—technological readiness, market factors, and economic impact—have changed considerably since the Staff ZEV Technology Review of April 2007.

(see <http://www.arb.ca.gov/msprog/zevprog/zevreview/zevreview.htm>).

Updated data should guide ARB's actions. For example, the Staff Review estimates that consumers will 'break even' on the battery costs of electric vehicles when gasoline prices reach approximately \$2.75-\$4.25 per

gallon. Gasoline prices already have hit the higher end of that range, and battery prices are falling. Next-generation lithium-ion batteries are being developed by a number of manufacturers in Asia, Europe, and the US; they are being readied for commercial availability in OEM (Original Equipment Manufacturer) car models that will deliver near 100-mile range. Existing lithium-ion batteries are also being used by non-OEM manufacturers to produce EVs with greater than 200-mile range. Thus, the advances and readiness of battery technology, coupled with the economic impact of the price of gasoline, have dramatically improved the market picture for battery electric vehicles (BEVs) in the past year. Furthermore, the Staff Review is based on inaccurate OEM estimates of the projected costs for plug-in hybrid electric vehicles (PHEVs) and hydrogen Fuel-Cell Vehicles. Table 6.1 (Incremental Vehicle Cost Estimates) relies on 2003 data for battery costs and OEM guesswork about the cost of fuel-cell technology in 2012. The conclusion that a PHEV in 2012-2014 will cost \$25,000 more than a conventional vehicle is not supported by current prices. OEM HEVs are now being converted to PHEVs for \$10,000 or less, and at least two OEMs plan to market new PHEVs in 2010 with an incremental cost of less than \$15,000. The conclusion that BEVs will cost from \$35,000-\$65,000 (Type I) to \$80,000-\$120,000 (Type II) more than conventional vehicles is also over-estimated. On the other hand, the OEM opinion that a Fuel-Cell Vehicle in 2012 will only cost \$250,000-\$350,000 more than a conventional vehicle appears to be wishful thinking, given the lack of significant progress in many areas of Fuel Cell technology—including range, hydrogen storage, fuel cell life, cost, etc—and other major impediments to mass production. ARB's pessimistic under-emphasis on requiring auto manufacturers to produce the necessary numbers of BEVs is compounded by its optimistic over-emphasis on research and development of Fuel Cell Vehicles. The urgency of reducing GHG emissions should guide ARB to create a Battery Electric Vehicle Partnership for fulfilling near-term reductions, while realistically relegating Hydrogen Fuel Cell Partnership as an option that may in the longer-term future (post-2020) become a viable option for reducing GHGs. Today, Fuel Cell Vehicles should be considered a "risk strategy" that may not match the technology and performance characteristics of other options in a relevant time frame. Over-commitment to this very expensive and unripe technology is likely to divert funding away from more promising near-term options, and delay real solutions for decades. This would greatly increase the risk of failure to achieve reductions in GHGs in the transportation sector. 6 A re-ordering of AB 32 priorities toward increasing the production of BEVs should encompass augmented funding for the immediate development of plug-in hybrid vehicles (PHEVs). According to the Electric Power Research Institute (EPRI), half the cars in the US are driven 25 miles a day or less. It is also well understood that automobiles emit a greater percentage of pollution in the first few minutes of operation. Even an HEV, with its reliance on the gas engine to charge its battery, will commonly trigger the start-up of its gas engine for the first use of the day. On the other hand, a PHEV will rely on its electric motor almost exclusively for those shorter trips. Thus, the PHEV, especially on shorter-range trips, has the potential to increase the fuel efficiency of HEVs by 50% or more, while virtually eliminating the cold engine emission factor. PHEVs would therefore be an effective strategy for reducing both GHGs and criteria pollutants. Recognizing the importance of PHEV technology, Google is in the process of converting its business fleet from HEVs to PHEVs. This is being accomplished by the installation of an after-market Battery Range

Extender Module that results in double to triple the fuel efficiency of the conventional hybrids. Another private company has developed an ultra-capacitor component that is designed to enable smaller battery packs to provide outsized acceleration in PHEVs. The company is currently shopping for an OEM to mass-produce a PHEV which incorporates the innovation. To help both OEMs and PHEV conversion companies produce PHEVs, ARB can create a program and incentives to encourage the conversion of the 100,000 HEVs that are currently in use on California highways. This would have immediate results in better fuel economy, fewer visits to gas station, lower fuel costs, a longer all-electric drive range, and a significant reduction in all types of emissions. To jumpstart the development and adoption of this new technology, ARB could mandate that all purchases and leases of state fleet vehicles of the appropriate class and size be PHEVs or ZEVs. This would create a working example that would incentivize manufacturers to fine-tune the technologies, increase production of units, and stabilize pricing and availability. Conversions alone, however, will not reach AB 32 GHG goals. ARB can also design requirements and incentives for OEMs to ramp-up factory production of PHEVs and EVs, and to provide reasonable service warranties for HEVs that have been converted to PHEVs. The economic, political, social and health issues caused by reliance on conventional fuel consumption in the Transportation sector will increasingly crossover into the Utilities sector as transportation becomes electrified. Clearly, a BEV that is charged from coal-fired generators will be responsible for more 'upstream' GHG emissions than one powered by solar- or wind-produced electricity. However, it is notable that California only gets about 16% of its electric power from coal, far less than the US average of 50% (or more), and further reductions in the share of coal power in this state are likely—especially given the legal framework that now regulates carbon emissions from coal plants delivering power to California's electric grid. This means that California is in one of the best positions to realize the benefits of electrification of transportation. Possibly the greatest challenge facing ARB is to envision and co-ordinate programs for all of the different sectors with state and local agencies. One innovative program in the Utilities sector -- Community Choice Aggregation -- has the potential to create a network of localities for accelerating the statewide adoption of renewable sources of electrical generation, while also offering unique opportunities for electrification of vehicles.

Utilities Sector: Community Choice Aggregation (CCA) and Increased Use of Renewable Energy Summary: To date, approximately forty California local governments are in the process of considering and/or implementing Community Choice Aggregation (CCA). CCAs, like Investor-Owned Utilities (IOUs), participate in the statewide mandate for reaching 20% renewables by 2010. However, most of the California CCAs have adopted goals to double, triple or quadruple the renewables percentages currently deployed by the IOUs. A major intent of CCA legislation is to encourage investment in, and build-out of, renewable energy production facilities in each locality throughout the state. CCAs provide consumers with administrative channels which fiscally support alternatives to conventional fuels, potentially jumpstarting the funding necessary to make cleaner (and ultimately less costly) alternatives economically viable and available to residents and businesses.

The Expert Advisory Panel to ARB has singled out local governments

as responsible entities for implementing greenhouse gas reduction in the energy sector. However, the Panel Report failed to include one of the most powerful tools the state has created for enabling local governments to have a voice in energy policy decisions: Community Choice. Community Choice is strongly supported by the Sierra Club, particularly because it can help reduce the environmental footprint of our energy supply. California has joined the states of Ohio, Massachusetts, New Jersey, and Rhode Island in establishing a Community Choice law (AB 117, 2002). The legislation authorizes local governments (cities, counties, or a group of cities and/or counties) to combine the buying power of all customers in their jurisdiction for purchasing electricity in an entity called a Community Choice Aggregation, or "CCA". This is done, in order to achieve, among other benefits, local control over energy policy decisions, more customer friendly services, and an expanding percentage of renewables in their local portfolios. To date, approximately forty California local governments are in the process of considering and/or implementing CCAs. In the CCA structure, local entities do not secure power for themselves, but rather sign contracts with state licensed electric service providers who are experienced in power purchasing. Transmission and distribution wires continue to be owned and operated by the local utility company. The utility company also retains responsibility for billing consumers, and may collect a Cost Responsibility Surcharge from all customers who join the CCAs. This surcharge is designed to include the same expenses that are paid by all other customers who continue to receive service from the utility company. The surcharge is not permanent, and most of the amount will expire by 2012. CCAs, like Investor-Owned Utilities (IOUs), participate in the statewide mandate for reaching 20% renewables by 2010. However, most California CCAs have adopted goals to double, triple or quadruple the renewables percentages currently deployed by the IOUs. When a community forms a CCA, the IOU which services the community retains its renewables portfolio, including the share that formerly was used to supply the departing customers. This means that forming a CCA actually benefits the utility company by increasing its percentage share of renewable energy, since the same amount of renewable energy now serves the remaining customers who have not switched to CCA. For this reason it is important to understand that any renewable supply for the CCA should be measured from a correct baseline. In general, the renewable power supply that a CCA contracts with or builds itself will represent an increase in renewable power to the state. This is certainly the case if the CCA finances and builds its own new renewable energy supply. A major intent of CCA legislation is to encourage investment in, and build-out of, renewable energy production facilities in each locality throughout the state. This can be accomplished by the CCA providing financing and/or guaranteeing long-term purchase contracts to prospective builders of renewable energy facilities. Use of public financing, such as low-interest municipal bonds, can significantly reduce the cost of renewable energy and help to make renewables competitive with conventional power supplies. Bond financing can cut the long-term cost of renewable energy by 5 % to 50%. (see California Energy Commission, Comparative Costs of California Central Station Electricity Generation Technologies (2007 Update) - FINAL STAFF distribution wires continue to be owned and operated by the local utility company. The utility company also retains responsibility for billing consumers, and may collect a Cost Responsibility Surcharge from all customers who join the CCAs. This surcharge is designed to include the same expenses that are paid by all other customers who continue to

receive service from the utility company. The surcharge is not permanent, and most of the amount will expire by 2012. CCAs, like Investor-Owned Utilities (IOUs), participate in the statewide mandate for reaching 20% renewables by 2010. However, most California CCAs have adopted goals to double, triple or quadruple the renewables percentages currently deployed by the IOUs. When a community forms a CCA, the IOU which services the community retains its renewables portfolio, including the share that formerly was used to supply the departing customers. This means that forming a CCA actually benefits the utility company by increasing its percentage share of renewable energy, since the same amount of renewable energy now serves the remaining customers who have not switched to CCA. For this reason it is important to understand that any renewable supply for the CCA should be measured from a correct baseline. In general, the renewable power supply that a CCA contracts with or builds itself will represent an increase in renewable power to the state. This is certainly the case if the CCA finances and builds its own new renewable energy supply. A major intent of CCA legislation is to encourage investment in, and build-out of, renewable energy production facilities in each locality throughout the state. This can be accomplished by the CCA providing financing and/or guaranteeing long-term purchase contracts to prospective builders of renewable energy facilities. Use of public financing, such as low-interest municipal bonds, can significantly reduce the cost of renewable energy and help to make renewables competitive with conventional power supplies. Bond financing can cut the long-term cost of renewable energy by 5 % to 50%. (see California Energy Commission, Comparative Costs of California Central Station Electricity Generation Technologies (2007 Update) - FINAL STAFF REPORT, CEC-200-2007-011-SF.) The local nature of CCA programs enables each entity to tailor their energy supply according to the particular geographical strengths and resources. For example, portfolios can be assembled from power generation by solar photovoltaics, solar thermal, wind, geothermal, hydroelectric, tides and waves, ocean thermal, and biomass/methane combustion. By providing local communities with administrative power to financially support alternatives to conventional fuels, CCAs can jumpstart the funding necessary to make cleaner alternatives economically viable and available to residents and businesses. Traditionally, the California Public Utility Commission (CPUC) has regulated the IOUs across the state. The three major IOUs- Pacific Gas, and Electric (PG&E), Southern California Edison (Edison), and San Diego Gas and Electric (SDG&E)- have expressed a laundry list of concerns about CCA implementation, and in some instances, have actively sought to impede the development of CCAs in their service areas. For example, PG&E is currently involved in legal disputes with the San Joaquin Valley Power Authority -- the governing body for a CCA comprised of 12 municipalities in the Kings River Conservation District. While some IOU-CCA disputes involve control over local power generating sources, others arise due to the 'risk adverse' nature of the IOU corporate structure in general. IOUs are simultaneously responsible to their shareholders for maintaining economic profits and to their customers for maintaining utility services. These dual responsibilities have the effect of creating a vested interest in preserving existing infrastructure retained by the utility- the transmission and distribution system and nuclear power plants. Renewable and natural gas power plants have nearly all been divested under the market restructuring of the 1990s, and utility companies are not given a profit for purchasing power from these sources. Utility companies often oppose new technologies or market

structures which they perceive as disruptive to the status quo, and this has been a source of conflict over implementation of a wide range of programs, including CCA. In addition to utility companies fighting CCA, there are other important market barriers to implementing clean energy. The IOUs and the CPUC have used a 'Least-Cost/Best-fit' criterion for evaluating contract needs, which often stacks the deck against renewable power. This method evaluates 'one contract at a time' under a competitive solicitation process to determine which power generation is the least costly for fulfilling utility service needs. That type of evaluation is incompatible with efforts to transform the existing energy supplies for at least three reasons: 1) A contract-by-contract approach is too fragmented to successfully redesign the entire electric system as a renewable system, 2) The "Best-Fit" criterion means that renewable supplies must fit in to a system that is designed around conventional power sources, not for integrating renewable energy, and 3) It requires all renewable energy to compete with forecasted prices for natural gas power plants. This last point has multiple problems: renewable energy often provides greater service than it is given credit for, particularly for environmental protection, and natural gas price forecasts have been notoriously low, which understates the price-risk protection that renewables provide. Actually, the IOUs' current 12-13% renewables portfolios were built almost entirely in the 1970s and 1980s when state and federal tax credits were in place. Since the inception of AB 107, the IOUs have hardly increased the percentage of renewable energy in the state. Instead, we have seen a massive build-out of new natural gas fired power plants, exceeding 15,000 megawatts. Furthermore, five years into the renewables program, no penalty has ever been assessed for non-compliance, even though IOUs have consistently fallen short on mandates. The loopholes entertained by the CPUC are too broad and lax, and the penalty assessment cap -- were it to be enforced -- of \$25 million per utility represents a meager fine in comparison with billions in yearly revenues and profits. One of the most important roles that ARB could play in this realm is to recommend restructuring of state law to allow a price structure that is more favorable to renewable energy, such as "feed-in tariffs" that insure full compensation for cost of renewable energy plus a fair rate of profit (discussed more fully under Market-Based Incentives below). Given the fact that the electric utilities account for over 20% of the state's total GHG emissions, it is imperative for ARB to facilitate a restructuring of the state's reliance on conventional fuels for its electricity generation. The current impasse among the IOUs and the nascent CCAs could be ameliorated by new ARB regulations that formalize the connection between the growth of CCAs and the fulfillment of the AB 32 mission. Participation in the CCA initiatives provide venues for the IOUs to compete in achieving higher levels of renewable energy without bearing all of the planning burdens for new infrastructure, and without being outpaced by consumer demand for renewable sources of power generation. ARB can provide a 'voice of reason' in this arena and can bypass traditional obstacles to achieving meaningful progress in this sector. For example, ARB can play a role in forging fair rules and accommodations for co-generation and distributed generation of renewables within CCA portfolios. In its 2007 Integrated Energy Policy Report, the California Energy Commission (CEC) declares: "Distributed generation and combined heat and power, regardless of size or interconnection voltage, are valuable resource options for California. Combined heat and power, in particular, offers low levels of greenhouse gas emissions for electricity generation, taking advantage of fuel

that is already being used for other purposes. " As the CEC has pointed out, it will be important to create rules that are not discriminatory against cogeneration, as these facilities combine what would otherwise be two emission sources into one location. A narrow view might otherwise make it appear as though the cogenerator were increasing emissions on the site, when in fact they are substantially reducing emissions overall for the energy sector in a given area. Clearly all such facilities must meet all applicable air quality standards, and special attention should be paid not to increase criteria pollutants in heavily impacted areas. Distributed generation, such as local solar, wind or fuel cells, can also play an important role in helping to meet local capacity requirements. (See: <http://www.energy.ca.gov/2007publications/CEC-100-2007-008/CEC-100-2007-008-CMF.PDF>).

Traditionally, distributed generation has been penalized with 'standby reservation' charges, while combined heat and power has been taxed by non-bypassable charges. This is just one area where ARB could assist in removing barriers to adoption of more favorable clean energy portfolios by CCAs. Unlike utility companies, CCAs are groups of customers. This is important since cogeneration and distributed generators allow customers to generate their own power, and thus reduce usage of utility owned assets. Rewarding clean local and onsite power supplies would thus be a stabilizing influence to the emerging clean power generation market, and substantially contribute toward a statewide reduction in GHG emissions.

Waste Sector: Zero Waste Policies and Landfill/Composting Regulations Summary: Sierra Club California endorses the Zero Waste Hierarchy - Reduce, Reuse, Recycle, Compost, Discard - as the model to accomplish CIWMB's Zero Waste policies. We urge ARB to implement ETAAC's recommendations for 'lifecycle tracking' of manufactured products, for the reduction of landfill waste by requiring recycling in the commercial sector, and for the construction of discrete composting facilities to separate greenwaste from landfill waste. Furthermore, in order to ensure the continued viability of the composting industry in California, proper co-ordination among state and local agencies is essential for achieving reductions in VOC and GHG emissions in concert, attendant to rules and regulations which adopt economically- and technologically-sound solutions.

California is a US leader in recycling programs at both the state and local levels. The California Integrated Waste Management Board (CIWMB) is promoting a 'Zero Waste California' program at the state level that redefines the concept of waste to include the assurance that products are designed and manufactured with the potential to be repaired, reused, or recycled: "In the past, waste was considered a natural by-product of our culture. Now, it is time to recognize that proper resource management, not waste management, is at the heart of reducing waste sent to landfills... For years, we have been throwing valuable resources away—the same resources we will inevitably need in the future—all in the name of consumer and manufacturer convenience" (<http://www.zerowaste.ca.gov/WhatIs.htm> ).

On the local level, notable California city mayors have signed the United Nations Urban Environmental Accords (2005), which address seven environmental areas common to all the world's large cities: water, energy, waste, urban design, transportation, urban nature, and environmental health. To reduce the waste stream in their

cities, these timetables have been established: 1) Achieve Zero Waste to landfills and incinerators by 2040; 2) Adopt citywide laws that reduce the use of disposable, toxic, or non-renewable products by at least 50% by 2012; and 3) Implement 'user-friendly' recycling and composting programs, with the goal of reducing solid waste disposal to landfills and incineration by 20% per capita by 2012. (See: <http://www.cameronforcolumbia.com/Downloads/Documents/UNEnvironmentalAccords.pdf> ). The CIWMB emphasizes that Zero Waste will only succeed if local governments, businesses, industry, and private citizens embrace coherent resource management programs. The Sierra Club wholeheartedly embraces Zero Waste policies, and agrees with CIWMB that the two major points for scrutiny of consumable products are at the beginning and end of their lifecycles, i.e., at the points of manufacture and disposal.

Zero Waste is based on the concept of Extended Producer Responsibility (EPR). EPR requires that manufacturers, retailers, and consumers share responsibility for minimizing a product's environmental impact (e.g. 'embedded or upstream' emissions) throughout all stages of the products' lifecycle. EPR is also called 'product stewardship'. At the birth of a product, Zero Waste requires that materials, containers, and packaging be cleanly manufactured, without contributing to GHG and criteria air pollutant emissions. At the sale and consumption phases, Zero Waste privileges those products that are reusable and have been manufactured locally. At the end of the cycle, Zero Waste creates a hierarchy of actions which emphasizes reusing, recycling, and composting in descending order, and resorts to the discarding of materials as a last resort (see <http://www.sierraclub.org/committees/zerowaste/policy.pdf> ).

The 2008 ETAAC Report supports the concept of 'lifecycle tracking' as one of a "suite of emissions reduction protocols for recycling" in the commercial sector, along with the use of secondary or post-consumer materials in manufacturing, and the separation of cardboard and paper from other commercial waste. The Report suggests that any firm generating 4 or more cubic yards of waste per week be required to "implement a recycling program that is appropriate for that kind of business." Lifecycle initiatives directly address the issue of embedded or upstream GHG emissions which are present in every manufactured product. Likewise, the Zero Waste Hierarchy recognizes that the recycling of manufactured products has the effect of offsetting embedded emissions by extending the useful lifespan of the materials, while simultaneously eliminating the emissions that would have been attendant to the new manufacture of similar materials.

Sierra Club California urges CIWMB and ARB to implement regulatory mechanisms that reverse business-as-usual practices which have led to steady increases in GHG emissions in the industrial sector (Manufacturing processes account for 18% of total GHG emissions statewide). The state's 92 million tons of annual waste can be dramatically reduced by instituting lifecycle tracking of GHG emissions for all of the major mass-produced commodities. Manufacturers who meet a certain of volume of sales and/or exceed GHG emissions thresholds would be required to produce a lifecycle environmental impact statement. The statement would include a plan for how the waste impact would be mitigated. Until the present, businesses have calculated their costs without pricing the impact of their actions on the environment. In effect, the benefits have been privatized and the costs have been socialized.

A reformulation of waste policies under AB 32 goals provides an opportunity for the business and industrial communities to work together with government and consumers to fairly distribute costs associated with reducing current GHG emissions from manufacturing processes and landfill facilities.

ARB has wisely recognized that improved landfill methane capture qualifies as an 'early action measure' under AB 32, and has expeditiously co-authored draft regulations with CIWMB to limit the volume of surface methane emissions from municipal solid waste (MSW) landfills to 200 ppmv, effected by requiring the installation of gas collection and control systems for maintaining those limits. At the same time, ARB also recognizes that these measures are transitional in nature, since the co-mixing of organic materials and non-recyclable materials is a sub-optimal practice slated to be discontinued as Zero Waste policies mature. Towards this goal, ARB's staff is currently working with the San Joaquin Valley Unified Air Pollution Control District and the CIWMB on two fronts: 1) to resolve conflicting studies measuring VOC emissions from composting facilities, and 2) to establish regulations that will cohesively address the Air District's concern with VOC emissions from composting facilities and the IWMB's focus on reducing GHG emissions through increased build-out of composting facilities statewide.

Establishing composting standards is an area where co-ordination among state and local agencies is essential for achieving reductions of air pollutants and emissions in concert, and Sierra Club appreciates the Air Resources Board efforts in working toward a comprehensive model. Sierra Club urges ARB to continue its oversight of the Waste sector by endorsing the cessation of diversion credits for the use of greenwaste as alternative daily cover, and by endorsing assessment fees for dumping compostable waste in landfills. Most importantly, ARB should advocate the separation of compostable organics (exclusive of sewage sludge or bio-solids) from materials deposited in landfills. In addition, assessments on carbon emissions, whether in the form of taxes, fees or auction revenues, should be used to subsidize technology upgrades to compost facilities so that they can comply with regulations for air quality and GHGs and also remain in business.

To assist ARB and CIWMB in rethinking the current design of waste facilities, Sierra Club proposes the statewide installation of 'Resource Recovery Parks' -- locations that centralize and integrate facilities for reusing, recycling, composting, and discarding materials. Such parks can include repair services, retail sales of reclaimed products and landscaping supplies, organically composted gardens, educational tours, and public amenities. The regional environmental park operated by the Monterey Regional Waste Management District in the city of Marina provides a model for this idea. The Park is comprised of three areas: 1) a 315 acre landfill site that houses construction and demolition recycling operations, composting facilities, and a soils-blending facility; 2) a 126 acre buffer zone of Salinas River floodplain; and 3) a 20 acre site that houses administration and maintenance buildings, a scale-house, a public drop-off recycling station, retail 'resale and materials recovery' businesses and stores, a landfill gas power project, and a household hazardous waste collection facility (see <http://www.sierraclub.org/committees/zerowaste>).

The Waste sector is connected to all other sectors in the sense that it is the recipient of their discarded or 'used-up' materials. An innovative method of rethinking Waste's connection to our daily activities would be for ARB to partner with other agencies in developing demonstration projects for employing composted greenwaste and recycled products in a variety of state-and city-sponsored activities. The use of compost can benefit agricultural operations, landscaping businesses, and public parks and roadway plantings, which all contribute to GHG emissions by their reliance on pesticides and synthetic fertilizers. Such projects can help attain AB 32 goals for achieving Zero Waste by transforming discarded materials into useful resources.

## Market-Based Incentives

### Feed-in Tariffs (FiTs)

Feed-in Tariffs (FiTs) have been used in over 37 countries around the world for accelerating the adoption of renewable electricity generation, and for stabilizing the market prices of new technologies. A FiT establishes a price paid for a particular source of renewable energy -- such as wind, solar, or geothermal -- that is based on the actual cost of producing a kilowatt-hour (kWh) of electricity from that power source. This method is distinguished from California's system of using a 'market price referent', which evaluates each renewable energy contract based upon the expected future price of natural gas base-load generation. FiT implementation frequently obligates a utility company to buy renewable energy at rates higher than they might pay for a kWh of electricity generated by conventional fuels, often at rates based on the cost of production. Any extra energy costs are distributed among all customers. In Germany, for example, it is commonly said that the added monthly fee on consumers' bills is comparable to the cost of a loaf of bread. US and worldwide polls have shown that most consumers are willing to pay more for electricity generated by renewable power sources. FiTs encourage the stabilization of energy prices because renewables' producers are guaranteed a 10, 15, or 20 year fixed price per kWh. This structure enables manufacturers to predict demand and to allocate investment resources with confidence. Prices for new contracts may be gradually lowered to encourage efficiencies in new renewable energy technologies, or they may be adjusted upward if the prices established are not sufficient to stimulate the market. In February 2008, the CPUC approved a FiT to support the development of up to 480 megawatts (MW) of renewable generating capacity from small facilities throughout California. The PUC regulation targets wastewater treatment facilities and livestock operations that have upgrades to compost facilities so that they can comply with regulations for air quality and GHGs and also remain in business.

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The FiT is an efficient market-based tool to implement a Renewable Portfolio Standard. In particular, it avoids much of the complexity, risk and delay that renewable developers face under the current regulatory structure, and that have created a formidable barrier to new projects. A FiT in California should be tied to meeting the state's RPS goals. One option would be to require utility companies to participate until their RPS obligations have been met, or in the alternative, they should be penalized for non-compliance with AB 107 mandates. A third alternative, following the German model, is to pool the incremental costs of renewable energy generation on a statewide basis, and apportion the costs to IOUs based on actual costs paid to generators. Under this alternative, IOUs would offer contracts at the FiT rate until the state RPS goal is met. This is a clear area where CARB's ability to take leadership by researching and recommending rational and necessary solutions is needed to overcome institutional prejudices against adopting cleaner technologies for power generation.

#### Cap-and-Auction and Offsets

The scoping plan should adhere to the legislative requirements in AB 32 mandating that the Board study the potential impacts on community air quality of any market-based compliance mechanisms, before adopting any such mechanism. Should California adopt a mechanism that creates emission allowances, it is vital that it require that all old and new sources of greenhouse gases pay for the privilege of using limited carbon sinks. Give-away carbon

permit schemes, in which current emitters are permitted to turn their pollution into economically valuable rights, would violate this principle.

If CARB establishes a market for carbon emissions, after following the review process required by AB 32, allowances or permits should be auctioned. The auctioning of permits allows for the reduction of permits, and emissions, over time, so the market adjusts to reflect the true cost of greenhouse gas pollution. Such a mechanism for pricing the carbon released into the atmosphere is essential if we are to raise investment funds to construct the new clean energy economy in California, provide investment capital to guarantee that new technologies are available to our existing infrastructure, and make certain that the effects of re-pricing carbon fuels are not felt disproportionately by working families and small businesses. We believe that AB 32 has given ARB the authority to establish an auction system.

Freely issuing emission permits to industry based on historic performance would create a trading system with inherent flaws. Some industries may use such a system to guide them in making rational investments that achieve a beneficial social outcome. For others, however, it would provide a perverse incentive to shut down existing California plant capacity and either relocate in other states or distant parts of the world. An auction system is capable of raising funds that can provide meaningful incentives for reinvestment in domestic energyefficient industries. This could strongly counteract any potential flight of industry from the state, and would help assure the immediate goal of protecting the domestic economy.

Furthermore, Sierra Club will oppose any market system that would relieve carbon polluters from paying their fair share of the costs of the carbon they emit in exchange for "offsets," either internationally for CO2 emissions, or domestically for activities designed to enhance carbon sinks, like tree planting. While government and private support for programs that increase soil carbon content and reforestation are highly desirable, it is impossible to retain the enforceability and effectiveness of a carbon pollution trading scheme if it is combined with efforts to preserve and enhance carbon sinks. We need both 80% reductions in CO2 emissions and strong programs to enhance carbon sinks; we should not "trade" them off against each other. In addition, there are verification and "additionality" problems that severely impact the enforceability and validity of a cap-and-trade or offset system. By contrast, an auction without offsets allows the market to reflect the cost of carbon pollution while providing greater assurance of achieving greenhouse gas emission reduction goals.

If market mechanisms are used, they should be designed so that they contribute to verifiable and enforceable CO2 reductions and work in harmony with other components of the climate change strategy, especially standards and incentives for promoting efficiency, conservation and renewable energy. Funds raised through the auction of carbon allowances should be used for public purposes such as energy efficiency, promotion of renewable energy, mitigation of ratepayer impacts, needed infrastructure in impacted communities, and job training opportunities in renewable energy for individuals working in the fossilfuel industry.

Forests can play an important role in reducing the impact of

global warming, since approximately half the weight of a tree is carbon. Growing larger, older trees is helpful because they capture and store more carbon. Conversely, converting forests to other uses, through sprawl and development, eliminates carbon storage opportunities now and into the future, and should be discouraged. Although forests will have a role in addressing global warming, they have many values besides carbon storage, and need to be managed in a way that promotes healthy natural systems. Above all, the ability of forests to store carbon should not become a justification for higher emissions of air pollution.

Allowances and auction revenues should be used to accelerate deployment of clean energy technologies, with priority given to the cleanest, cheapest, safest, and fastest means of reducing emissions. On the other hand, the Sierra Club strongly believes that a carbon pollution auction scheme is by no means the only option for reducing carbon emissions. At best it should be considered only one possible tool among many, and we urge ARB to remain open to alternative compliance options such as direct regulation with fines for non-compliance, or direct charges like fees or carbon taxes.

#### Conclusion

ARB's mandate to author a Scoping Plan for AB 32 gives it wideranging authority to take wide-ranging laws and integrate these in a constructive way, to work collaboratively with local air quality districts and CCAs, and to coordinate state programs to quickly achieve quantifiable results. Where these are not sufficient, ARB can use its key role under AB 32 to help the legislature and state regulatory bodies to move to more effective policies. ARB is currently in a position—of truly global significance—to enact measures which can lend a greater degree of predictability and stability to this emergent paradigm. Sierra Club California recognizes the magnitude of the responsibilities laid upon the Air Resources Board, and is willing to work with staff and assist in any way we can. Thank you for this opportunity to participate in the Scoping Plan process.

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## **Comment 114 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: David

Last Name: Assmann

Email Address: David.Assmann@sfgov.org

Affiliation: City and County of San Francisco

Subject: City of San Francisco Comments on AB 32 Draft Scoping Plan

Comment:

The City and County of San Francisco looks forward to partnering with the state to help tackle the greatest environmental challenge of our time. The following is our input into the Draft Scoping Plan. While the Plan emphasizes that local governments and regional government agencies are essential partners in achieving California's greenhouse gas goals, the only target attached to the local government section is a transportation measure, which vastly understates the contribution that local governments can, should and will bring to the goal of reducing greenhouse gas emissions.

Most greenhouse gas emissions are local. Cities now produce seventy-five percent of all the world's greenhouse gas emissions, so climate solutions that ignore municipalities do so at the planet's peril.

Local governments are on the front lines in fighting the sources of global warming: from revising building codes, promoting energy efficiency, providing recycling and compost services, requiring renewable fuel and energy use, and managing transit systems. Cities too, are responsible for dealing with the impacts of the climate crisis: from providing the first responders in case of extreme weather events to dealing with the day-to-day climate implications for public health, infrastructure, and local economy.

More than 852 US cities, including San Francisco, have committed to reduce their greenhouse gas emissions to Kyoto Protocol levels (or beyond). Before we develop an entirely new set of complex regulations to help us implement AB32, we could learn a lot by recycling a few ideas from our past.

In the 1980's, California faced another big environmental crisis: we were running out of space to put our garbage. At that time the state only recycled 11% of all waste and landfills were reaching capacity. In 1989, the State legislated that every city and county achieve a fifty percent recycling rate by 2000 (AB939). This was a truly audacious goal. However, it was the implementation that was precedent setting.

All local governments are required to report annually to the State in great detail on the types and quantities of waste diverted from landfill through reduction, recycling, and composting activities, as well as how they are going to meet the targets. Just as with measuring carbon emissions, waste is often a hard thing to track down. The profession of waste auditing and accounting was born.

Today every one of California's 536 local jurisdictions knows how much of their paper, scrap iron, lawn trimmings, bottles and cans, and even building materials is (or is not) being recycled. It is only through this level of detail that we can claim to have a hope of solving multi-source environmental issues from waste to carbon. Any jurisdiction failing to reach the recycling target can be fined \$10,000 per day. This threat allowed cities and counties to develop innovative programs like curbside food scrap collection as a way of avoiding hefty fines.

Rather than enacting a cooking-cutter regulation that would work for no one, the recycling law allowed each County to adopt a implementation strategy that would work for their communities. This flexibility fostered innovation and efficiency. At the same time, a Recycling Market Development Zone program was created to fuel new businesses wanting to profit from diverting waste from landfills.

This recycling law may be the single most effective piece of environmental legislation ever to come out of Sacramento. Today the City and County of San Francisco has been able to work with its residents and businesses to recycle and compost 70% of the waste (we were at 35% in 1990). This same basic legal framework should be applied to the issue of climate change.

Under this local CO2 reduction model, counties would be responsible for reducing carbon emissions from building energy, agriculture, manufacturing, and of course waste management. These plans should mandate both a municipal facilities and community wide target for energy, waste reduction and recycling, water and waste water, transportation and community design. Counties would work both locally and regionally to reduce vehicle miles traveled (VMT). The State would continue to have jurisdiction over large emitters like oil refineries, energy utilities, and over developing a low-carbon fuels policy.

The State needs to begin by establishing county-level reporting requirements and procedures. Cities and counties will then need financial incentives to develop the critical infrastructure that reducing and measuring carbon emissions will require.

Recent reports suggest that building dense transit-oriented urban areas can lead to a forty percent reduction in carbon emissions. Local land-use and zoning policies have therefore become one of the single most important tools in combating climate change.

With this newfound power comes the need for accountability. The State should hold counties answerable for meeting targets, and provide rewards to those who achieve more.

One of the major problems with the Draft Scoping Plan is that there are no targets for reductions from municipal efforts in recycling, water use or energy, nor are there any targets attached to planning and regional local government efforts. All of these are required elements for a comprehensive plan that would maximize our efforts and resources.

While both the Draft Scoping Plan and the appendices reference the vital role that local governments play in community energy, community waste and recycling, community water and wastewater systems, and community design, both the scope and appendices are void of any analysis or recommendations on how local government

can and should reduce emissions in these areas. By stating "although not quantified at this time, actions taken by local government are expected to provide significant greenhouse gas reductions" the majority of the efforts that many local governments are already putting into greenhouse gas reductions are essentially being left out of the Draft Scoping plan.

To put this into a numerical perspective, San Francisco's Climate Action Plan, passed in 2002 by the City and County's Board of Supervisors, set targets of reducing emissions by almost 2 million metric tonnes by 2012. San Francisco accounts for about 2% of the state's population, yet its reduction target is essentially equal to the local government target set for the entire state. San Francisco, and many other cities, have set targets that are at least double the total target set for local government actions by the state (San Francisco is committed to reducing municipal emissions by 25% by 2017, and 40% by 2025 from 1990 levels).

The draft plan and the appendices lump together local and regional governments, and it is not always clear what refers to local government operations, what is directed at local governments only and what applies to regional governments. In preparing the final scoping plan, we recommend that ARB include the following distinct sections under Local Government Actions and Regional Targets:

1. Actions and targets for municipal facilities and operations that are under the direct control of local government, which would include transportation, energy, water and wastewater and waste reduction/recycling.
2. Actions and targets for community wide activities that are directly influenced or under the control of local governments. For example, building codes can directly impact energy use, and greenhouse gas reducing targets should be implemented by local governments.
3. Actions and targets for regional efforts including efforts achieved through regional planning.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 18:20:19

No Duplicates.

## **Comment 115 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Charles  
Last Name: Plopper  
Email Address: cgplopper@ucdavis.edu  
Affiliation: UCDavis emeritus faculty

Subject: AB32 Scoping plan -general comments  
Comment:

July 30, 2008

SUBJECT: Comments on Draft AB32 Scoping Plan  
Dear Members, California Air Resources Board:

Thank you for your critical work to reduce California's greenhouse gases and the Draft AB32 Scoping Plan targeting 2020. Given the current state of the economy and the budget deficit, it is especially critical to set reasonable, but tough standards for reduction in energy use. Along with the overall greenhouse gas reduction, please keep in mind that there are other benefits to the State of California:

- Lower budget outlays for heating and air conditioning.
- Lower budget outlays for gasoline and diesel for vehicle travel.
- Lower air pollution and other environmental contamination.
- Reduction in health costs associated with polluted environments.
- Increased overall health and well-being of the population.
- Increased activity for California companies whose business is renewable energy.

In setting goals for the State to increase renewable energy and reduce vehicle miles traveled, please include the following recommendations 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,

Charles G. Plopper

Attachment: [www.arb.ca.gov/lists/sp-general-ws/243-ab32\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/sp-general-ws/243-ab32_scoping_plan.doc)

Original File Name: AB32 Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-07-30 22:17:32

No Duplicates.

## **Comment 116 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Michael

Last Name: Sarabia

Email Address: mchlsrrb@aol.com

Affiliation: TALC Member (Proud)

Subject: General Comments

Comment:

First, special commendation to your web designer. It is, by far, the best interactive way to derive many comments. I particularly like it keeping track of the comments I had read. Great Feature, you might guess I am a programmer, I hope any other skill will be apparent. I'll omit credentials, in case you see no evidence.

Second, a disclaimer: I read a sampling of all 101 comments, then, and I hope I reflect some of what I learn, or the opposite.

Third, I saw some repeated comments I agree, I will not repeat them, most of them congratulatory of your fine efforts.

-----  
1. I recommend incentives and penalties instead of mandates, that require enforcement staff, you are best at deciding what is practical and effective.

2. Therefore, I recommend a set of about two dozen clear simple declarative sentences to cause the desired objective for the public to ask our support. This way all will understand the specific goals. Expanded versions would also help for those that might be unfamiliar with some words, or legalese.

These are my recommendations:

1. Increase the cost of car registrations by 5% yearly. Allow discounts on new cars on the basis of rated mpg. Electric and Hybrid cars would have a fee to cover fee processing costs plus 20% or some such.

2. Implement the Insurance cost per mile for specially equipped cars with an State-approved, tamper-proof, milage device. This will help us know the actual cost of driving per mile.

3. Implement an SMOG tax together with the mandated bi-annual SMOG Check, also in a per mile basis using the same State-approved milage device.

4. Increase gasoline tax per gallon by 5% yearly or whatever is the maximum politically acceptable, 4.5%?

5. Prohibit all state agencies, including MTC, from switching any trasportation system to one that emits MORE pollution. There are plans to switch some from Electric to Diesel fuel, this should be prohibited. This may seem incredible but it is not. Did "they" give their word to a contractor, unofficially?

6. Beware of mass mailings with a repeated phrase in support of a particular point of view. I am pro-Windmills but I have seen Pro-Nuclear power partisans take over a political meeting and try to convert attendees with the worse and dishonorable forms of debate, including falsehoods, ridicule, etc. If you get all to use this system, word-frequency patterns could be detected. Their converts repeat word pattern and lie a lot. Like they say "It is the safest and cheapest", pro-Natural Gas partisans refuse to admit it is a Carbon-based fuel, they do not admit it is CH<sub>4</sub>. Vehement but rather simple minded.

This is my promotion of Windmills to ask for your support: Windmills are the cheapest and ought to be considered the best alternative energy source, Geothermal energy is second best. The cost of windmill electric power dropped in the last 20 years. Early wind farms in California, sold electricity at 38¢ per kilowatt-hour. Now, many wind farms produce power at 4¢ per kilowatt-hour, recently, some long-term supply contracts were made at 3¢ per kilowatt-hour -and the cost is still falling. In California, PG&E has not build any oil or carbon fueled powerplants for many years. California has a plan that lets homeowners buy Solar Cells for all their needs with reduced-interest loans.

In 1991, the U.S. Department of Energy's National Wind Resource Inventory pointed out that "three states, Kansas, N. Dakota and Texas have enough harnessable wind potential to fill national electricity needs"; many are unaware of this. Also, there is much propaganda to confuse the issue, for example: Scientific American (Jan, 2008) asserts solar cell electricity could cost 6¢ per Kw-hr by 2050 with \$420 Billion in Federal Subsidies! Why should taxpayers want to wait 40 years and invest \$420 Billion to produce electricity at TWICE the cost of Windmill power, now? Some assert that construction of enough windmills would take 30 or even 50 years. They probably think it is more difficult to build a windmill than a "Liberty" ship, perhaps they know nothing about either (?). Sen. Gore is right: We could switch to renewable energy by 2030, Europe intends to use 30 Percent renewable energy by 2020. Nuclear power is "sold" to voters as a Renewable Energy Source, this is false. Natural Gas is "sold" to the uneducated (see The Pickens Plan), as a Green Fuel, ignoring that each CH<sub>4</sub>, hydrocarbon molecule has as much Carbon as each gasoline molecule. With the exception of exotic fuels, a combustion engine that produces no Carbon Emissions, produces no power.

To fight Global Warming, all Carbon Emissions MUST end, totally, anywhere on earth. This is as unlikely as the survival of the human race -which depends on that.

Nuclear Power is prohibitive due to high building costs per rated Kilowatt output and lack of available commercial insurance. A major operator mistake can cause damage that lasts for many centuries, a risk so high, no insurance will sell coverage without government-backed support.

Construction of Nuclear Powerplants is forbidden in the U.S. until a legal Nuclear Waste site is certified safe for thousands of years, and Congress approves the site. This is most unlikely.

In my opinion, the 842 wildfires in California, produced by over

8,000 lightning, are the clearest indicator of Global Warming. The Western Drought is not, we have had many droughts before.

But, the lightning fell in the state that has the LOWEST average lightning in the nation! In California, lightning strikes an average of only 0.5 hits per sq. Km, per day.

It is, however, certain that the Carbon Emissions of these wildfires will ACCELERATE Global Warming.

There are propaganda claims the forest fire particles will dim solar radiation and REDUCE cooling in the North Pole and they even claim this will save the polar bear. Yeah, I read it!

Please, do not assume we are as well informed as you are.

Thank your for all the fine work you do. The best I have seen, in my work in NACA, NASA, USAF and aerospace companies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 22:48:24

No Duplicates.

## Comment 117 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.

First Name: Michael  
Last Name: Henn  
Email Address: calstep2@aol.com  
Affiliation:

Subject: Public comment-Draft Scoping Plan-AB32  
Comment:

Overlooked Opportunities to Fight Global Warming,

I am a city planner and currently serves on the Piedmont Planning Commission. I attended the Oakland meeting hosted by Assemblyperson Hancock on July 29th and offer the following comments:

The vague and limited recommended measures currently described by CARB staff will never produce the type of significant GHG reductions that AB 32 envisions. As long as the current disparity in funding exists between highways and other more Green means of transportation, it is unlikely that there would be any reduction at all. Please consider the following data:

- Trains are among the most energy-efficient modes of transport. In the United States, a truck uses about eight times as much energy to transport freight between cities as a train.
- Trains are among the most energy-efficient means to move people.

Based on a measure of the amount of energy required to move one passenger one kilometer in the United States, an inter-city train uses 948 kilojoules. A commercial airplane, on the other hand, uses three times this amount of energy, and an automobile with a single occupant uses six times this amount of energy.

Source: U.S. Department of Defense website:  
([https://energy.navy.mil/awareness/tools/tools\\_7.html](https://energy.navy.mil/awareness/tools/tools_7.html))

Given the differing energy demands generated by the different modes of transportation, which transportation mode does this nation fund most heavily? Considering all the rhetoric we hear these days about our need for energy independence and concern with global climate change, the following results should be a surprise. The 2009 Federal Transportation budget contains the following proposals:

Federal Highway program:	
	\$40.9 billion (60%)
Federal Aviation Administration:	
	\$14.6 billion (21%)
Federal Transit support	\$10.1 billion
(14.8%)	
Federal Rail subsidies	\$1.1 billion (1.6%)
Other (maritime, pipelines, canals)	
	\$1.1 billion (1.6%)

Source: <http://www.dot.gov/bib2008/pdf/bib2008.pdf>, p.11

In other words, 81% of the annual \$68 billion federal transportation budget goes to provide additional infrastructure to expand the two forms of transportation which are the most energy wasteful and emit the most greenhouse gas. 19% goes to all the rest. California highway spending mirrors the federal disparities. "If you build it, they will come" is more than a cliché from a movie. When we extend or widen highways and freeways, the results are obvious to all. Motorists take advantage of the newly unfettered road capacity. The total miles traveled grows, while travel on competing modes of travel falls. The US has been pursuing just this policy for the past 50 years, and the consequences have become obvious. Our auto-dominant travel patterns have long outgrown our energy supply, leaving us dependent on uncertain foreign sources.

The relatively recent awareness of global warning has caused numerous initiatives to address the energy problem. AB 32 is California's version that I fear is little more than a series of platitudinous goals and recommendations. The largest source of greenhouse gas emissions in California comes from cars and trucks. But unfortunately, most efforts deal with relative minutiae like fluorescent bulbs or paper vs. plastic bags. Or else, politicians pursue pie-in-sky magic pills like The Hydrogen Highway. Again, unfortunately, few of our leaders propose changes to the big-ticket items like providing real incentives to get people out of their cars, or to take the train for the shorter inter-city trips? I believe there needs to be increased public awareness about our current transportation spending priorities before we can effect change.

Clearly, President Bush is no help. He has been trying to kill off the paltry Amtrak funding for 8 years. Few environmental groups have pursued the goal of: "Instead of continuing to put 81% of our funding into roads and airports each year, let's think about putting that kind of money towards the green modes of travel: rail and transit." I would hope that is changed. Other than a few rail buffs and academicians, neither the media nor politicians are advocating doing those things that could substantially affect our energy and climate balance sheet. Several recent local news stories highlight our misplaced spending priorities: the \$420 million approved for a 4th bore for the Caldecott Tunnel; the State takes \$50 million from BART; and AC Transit is forced to raise fares again. Given the political clout of the highway, trucking, auto, and oil industries, making the substantial changes in our transportation funding formula will be a struggle, but it needs to start sooner rather than later.

Very truly yours,

Michael Henn  
226 Wildwood Avenue  
Piedmont CA 94610  
calstep2@aol.com

Original File Name: energy-trans-spendingCARB-V.doc

Date and Time Comment Was Submitted: 2008-07-30 22:50:42

No Duplicates.

## **Comment 118 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Sanders

Email Address: rebeccalaurensanders@gmail.com

Affiliation:

Subject: California needs smart land use planning!

Comment:

Dear CARB:

Thank you for the work you've done on the AB 32 Draft Scoping Plan. As an city planner, I have a few comments regarding the plan, which I hope you'll seriously consider.

1. 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.
2. 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. A public transportation system complemented by an extensive bike network would create attractive alternatives to driving, keeping California successful and ahead of the curve in the United States.
3. 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.
4. 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.
5. The plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion.
6. 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.

Thank you,  
Rebecca

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 06:02:46

No Duplicates.

**Comment 119 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Howard  
Last Name: Blackson  
Email Address: hb3planning@hotmail.com  
Affiliation:

Subject: Reduction of Vehicle Miles Travelled (VMT) Perspective  
Comment:

This Draft Scoping Plan dissapointingly misses the immediate value of reducing VMT to directly reduce Green House Gas (GHG - carbon emissions). Reconsider combining the value of new technology, to be invented and mass produced at some point of our lives, that this Draft SP values with the proven GHG reduction through reducing VMT.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 06:31:24

No Duplicates.

**Comment 120 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David

Last Name: Lippman

Email Address: dlippman@lvmwd.com

Affiliation:

Subject: Climate Change Draft Scoping Plan Comments

Comment:

Attaching pdf of comment letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/248-ltr.\\_california\\_air\\_resources\\_board.pdf](http://www.arb.ca.gov/lists/sp-general-ws/248-ltr._california_air_resources_board.pdf)

Original File Name: Ltr. California Air Resources Board.pdf

Date and Time Comment Was Submitted: 2008-07-31 07:36:24

No Duplicates.

**Comment 121 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David

Last Name: Assmann

Email Address: David.Assmann@sfgov.org

Affiliation: City and County of San Francisco

Subject: San Francisco Comments on Draft Scoping Plan

Comment:

PDF attached of comments from the City and County of San Francisco

Attachment: [www.arb.ca.gov/lists/sp-general-ws/249-carb\\_draft\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/249-carb_draft_scoping_plan_comments.pdf)

Original File Name: CARB Draft Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-07-31 07:46:31

No Duplicates.

## **Comment 122 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Brian

Last Name: Nguyen

Email Address: brian.briannnguyen@gmail.com

Affiliation:

Subject: Need to address the number one source of Global Warming.

Comment:

Hi .

AS we all know by now that number one source that caused Global Warming is the mass production of livestocks that feed the major fast food chains and most human worldwide. Please address this issue and encourage people to go for plant food base diet to stop this Global Warming 80% efficient. Also if we could go 100% green on our electricity without using coal or fossil fuel then we will be in good shape .Otherwise , all lives on this planet will be in danger , we could face extinction within three years or so if you and all Government officials are not acting drastic helps.

I don't know if you ever believe in Heaven and Hell , if you do , then you know what to do to go to Heaven and what to do to go to Hell. It is up to you to decide now , not to wait until you know it is too late then asking for mercy from God. It will be no use.

Please act to save our planet now.

Thanks .

Brian Nguyen.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 09:22:40

No Duplicates.

## **Comment 123 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Beverly

Last Name: Hoey

Email Address: bhoey@trustslaw-ca.com

Affiliation:

Subject: Clean Air for California and Global Warming

Comment:

Sirs:

Please do all that is in your power, and more so, to implement stricter standards on industries that pollute our environment. We all as citizens of this planet ought to be taking and implementing affirmative action NOW to build infrastructures in California that would provide better public transportation.

California has always lead the way in new laws, and new and higher standards for our air quality. Please keep that tradition going, and implement rewards to people to recycle their SUV's and gas gussling cars to build no emission forms of transportation.

We need to look to other countries to see how they handle public transportation. We ought to be able to improve uupon other countries ideas. We do not need to continue on this path of ever-seeking petroleum, resulting in the destruction of the planet and its precious air quality.

So many of us aare suffering from the bad quality of air, with asthma and COPD. Adults AND children are suffering. The future generations will suffer even worse, if you do not ignore the needs of big business; and focus on the needs of the Life that depends on good quality air. Be leaders! Take steps NOW! Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 09:30:26

No Duplicates.

**Comment 124 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Nabeel  
Last Name: Al-Shamma  
Email Address: nabeel@alshamma.com  
Affiliation: Sierra Club Sonoma Group

Subject: Auctioning & Carbon Fees  
Comment:

Thank you for all the work you've been doing on the Draft AB32 Scoping Plan to reduce California's GHGs by 2020. It's a tough job. Especially in setting goals for the State to increase renewable energy and reduce VMT. Please consider these recommendations for the Final Scoping Plan:

- The State should auction 100% of permits under the cap. Don't give free permits to polluters that subsidize coal and prolong the transition to cleaner energy.
- 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,  
Nabeel Al-Shamma

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 09:40:11

No Duplicates.

**Comment 125 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Robert

Last Name: Hamilton

Email Address: bobmann101@yahoo.com

Affiliation:

Subject: Global warming

Comment:

There is no scientific proof that man is the main cause of global warming. There is scientific proof that that global warming has reversed on it's own. Earth is a dynamic planet, changing all the time and will continue to change. The global warming scare is just another money making ploy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 10:14:47

No Duplicates.

**Comment 126 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 127 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Fiji  
Last Name: George  
Email Address: [fiji.george@elpaso.com](mailto:fiji.george@elpaso.com)  
Affiliation: El Paso Corporation

Subject: Comments from El Paso Corporation  
Comment:

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.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/291-draft\\_scoping\\_plan\\_el\\_paso\\_comments\\_v5final\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/291-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 10:55:28

No Duplicates.

**Comment 128 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Ray  
Last Name: Weiss  
Email Address: rfweiss@ucsd.edu  
Affiliation: University of California, San Diego

Subject: Verification of AB-32 Emissions Reductions  
Comment:

Please see the attached document entitled "Implementing AB-32: Effective Verification of California's Greenhouse Gas Emissions Reductions".

Ray F. Weiss and Ralph F. Keeling  
Scripps Institution of Oceanography  
University of California, San Diego

Attachment: [www.arb.ca.gov/lists/sp-general-ws/295-ca\\_ghg\\_emissions\\_verification.pdf](http://www.arb.ca.gov/lists/sp-general-ws/295-ca_ghg_emissions_verification.pdf)

Original File Name: CA\_GHG\_Emissions\_Verification.pdf

Date and Time Comment Was Submitted: 2008-07-31 11:01:36

No Duplicates.

## **Comment 129 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jay

Last Name: Jones

Email Address: jonesj@ulv.edu

Affiliation: University of La Verne

Subject: Reduction in Hydrocarbon based fuels is a Health concern

Comment:

Dear Board Members and other concerned citizens,

The need to curb fossil fuel use is critical on the basis of its effects on our health. As one who breaths the LA smog and yet knows what a joy clean air is, it is clear that we need to put strong measures in place to wean ourselves from this toxic material.

Clear evidence that curbing use will have a dramatic effects on air quality was demonstrated in the post 9-11 days when automobile, truck, and plane traffic were significantly reduced. The same can be seen on holidays such as Christmas. You know you can make a difference. We rely on your personal integrity and sense of responsibility to spur society in the right direction.

I urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments. The plan should also include additional strong regulatory measures on industrial sources to reduce emissions form petroleum refineries, power plants, cement manufacturers, and others sources.

It is vitally important the plan demonstrate that the variety of proposed measures will not only make rapid progress toward reducing greenhouse gases, but will also provide local benefits to communities in terms of improved air quality and public health.

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

Sincerely,

Jay H. Jones

Professor of Biology and Biochemistry

p.s. As one with a broad background in the biological/geological sciences as well as experience in the Oil and Gas industry, I would be delighted to flesh out the various dimensions of this issue. Feel free to contact me at 909 593-3511 x4040 or jonesj@ulv.edu.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 11:12:04

No Duplicates.

**Comment 130 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Anthony

Last Name: Wexler

Email Address: aswexler@ucdavis.edu

Affiliation: UC Davis Air Quality Research Center

Subject: Global Atmospheric Watch Monitoring Stations

Comment:

The state needs to monitor greenhouse gas and particulate emissions from the ocean and long range transport from rapidly-industrializing Asia because increased emissions from one or both may interfere with proposed validation of California's carbon emissions controls. The enclosed document is a one-page synopsis of the concept. Please contact me if more details are needed.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/301-gaw-carb\\_1pager\\_\\_073108\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/301-gaw-carb_1pager__073108_.pdf)

Original File Name: GAW-CARB 1pager (073108).pdf

Date and Time Comment Was Submitted: 2008-07-31 11:26:00

No Duplicates.

## **Comment 131 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: James

Last Name: Stevenson, Ph.D.

Email Address: jimstevensonphd@yahoo.com

Affiliation: American Lung Association

Subject: Reduction of airborne pollutants & locally developed sustainable energy

Comment:

I have had asthma for 60 years and regularly use a nebulizer, inhalers and an emergency inhaler to keep breathing. So far I have not needed oxygen, however I am anxious for California to develop a strong plan of action achieve immediate reductions in smog and other dangerous air pollutants.

We must reverse the trend to increasing asthma frequently in our population, particularly among our children. I urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. We must have an aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments to help with this effort. In Europe public land is available to community cooperatives for the placing of windmills and solar panels. We have no comparable movement in this country because of the absence of leadership to achieve a strong base of sustainable energy production. A community based plan should also include additional strong regulatory measures on industrial sources to reduce emissions from petroleum refineries, power plants, cement manufacturers, and others sources.

Air quality in California is a public health crisis. We have about 14,000 to 24,000 premature deaths from air pollution yearly, 350,000 asthma attacks and millions of missed school days from children suffering asthma attacks, thousands of hospitalizations and emergency room visits, and reduced lung function changes in children.

It is vitally important that your agency demonstrate leadership to develop the variety of measures will not only make move us toward reducing greenhouse gases, but will also provide local benefits to communities in terms of improved air quality and public health while also providing locally developed sustainable energy.

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 11:40:48

No Duplicates.

**Comment 132 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ernest F.  
Last Name: Ciccarelli, CPA  
Email Address: Ciccarelli@arrival.net  
Affiliation:

Subject: AB32 compliance  
Comment:

We need to insure that our environment is stabilized. Past polluters have not been paying their fair share. AB32 will help give future generations cleaner air with a stabler environment, creating better health and welfare for all. Please do your duty in promoting and protecting the hard fought gains and do not allow AB 32 to be circumvented or minimized. Thank you for your good service.

Sincerely,  
Ernest Ciccarelli, CPA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 11:49:07

No Duplicates.

**Comment 133 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mike

Last Name: Cluster

Email Address: mjcluster@earthlink.net

Affiliation:

Subject: Draft Plan: transportation alternatives

Comment:

I think there need to be stronger goals to reduce VMT, and in order to do this, a goal needs to be to increase the availability of public transportation, especially on the local level bus level. New developments (residential and business) need to be within walking distance of public transportation. Parking (and permits, fees, etc on land used for parking lots) should be more expensive, and stragies like insurance per mile should be used to reduce VMT

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 12:59:02

No Duplicates.

## **Comment 134 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: James

Last Name: Sallis

Email Address: [sallis@mail.sdsu.edu](mailto:sallis@mail.sdsu.edu)

Affiliation: San Diego State Univ

Subject: Health, land use, and transportation

Comment:

I appreciate the opportunity to provide input into the Climate Change Draft Scoping Plan. It is an enormous task to identify the most promising strategies to reduce our climate change impact while maintaining quality of life and economic vitality as much as possible. I am writing to call your attention to the need to improve three inter-related aspects of the Scoping Plan: health, land use, and transportation.

Though I am by training a health psychologist, my work has gradually evolved to require the collaboration of many disparate disciplines. My area of interest is physical activity, obesity, and related chronic diseases, and my work has taught me the strong connections of these factors to land use and transportation policies. There is much knowledge about these topics that can be applied to reducing carbon emissions.

I would like to make two points. First, the public health field needs to be a major partner in climate change planning, because there will be many health consequences of both climate change and mitigation efforts. Whether the health consequences are mostly positive or mostly negative depends on the decisions made. The current draft plan focuses narrowly on air quality, but several mitigation strategies could have major positive side effects on physical activity, obesity, and chronic diseases. Since Time Magazine identified me as an "obesity warrior", I am compelled to inform you that many health professionals believe obesity is the leading health challenge of our time, and the public ranks childhood obesity as the number one health issue for children. Thus, opportunities for win-win outcomes that benefit both climate change and obesity should be given very high priority.

Second, the key opportunities for win-win strategies are to dramatically increase goals for reductions in vehicle miles traveled (VMT) which will require changes in land use policies and transportation investments. As documented in the book "Growing Cooler" from the Urban Land Institute, people living in walkable (also known as smart growth) neighborhoods have 33% less VMT than those living in suburbs. Since most zoning and development ordinances in California essentially outlaw new walkable developments, there is a huge opportunity for local government policy changes to contribute substantially to reducing carbon emissions.

Zoning laws that favor or require walkable, bikeable developments, along with increased investments in pedestrian and bicycling

facilities and traffic calming will also have numerous health benefits. Based on literature reviews, the Transportation Research Board, Institute of Medicine, and Centers for Disease Control and Prevention have all concluded walkable communities are associated with more physical activity and lower rates of obesity. How much of an effect can we expect? Based on our own research (see attached brief, paper submitted), adults living in walkable neighborhoods walked 35-45 minutes more per week than those in suburban neighborhoods, thus meeting the 30-minute per day physical activity guidelines one more day per week. Rates of overweight were 3-8 percentage points lower among residents of walkable neighborhoods. These are meaningful differences that are difficult to achieve by other means.

Do people support walkable neighborhoods? Based on a national survey study we recently published, support is high and growing. Support for walkable neighborhoods was 44% in 2003 and 59% in 2005 after several studies were publicized showing the link between sprawl and health. Support was strong among all population segments, except rural residents who do not want any kind of development in their area. Notably, support was similar among conservatives, liberals, exercisers, and inactives. People see a lot of value in being able to walk many places they want to go. I imagine that support would be higher now that gas prices have increased so much. Though people are driving less due to current gas prices, those living in the suburbs and far from their jobs are forced to drive long distances. Thus, zoning and development policy changes are needed to stop the building of more sprawling subdivisions.

The link with transportation policy is simple. Less than 1% of transportation funds are spent on pedestrian and cycling facilities. As a result, it is inconvenient and dangerous to bike in most of California. An improved pedestrian and cycling infrastructure could lead to reduced carbon emissions through less VMT. The same investments will reduce injuries, increase physical activity, and help control the obesity epidemic. Another win-win.

As I understand the Draft Scoping Plan it proposes only about 1.2% reduction in carbon emissions from local government actions. That is hard to understand when there is vastly more potential for carbon reductions through more aggressive land use and transportation policy changes, which would also have major positive effects on our leading health problems. Public health organizations recommend these changes, and the public supports them. Thus, there are many strong reasons to propose much more ambitious VMT, land use, and transportation goals. Keep in mind your decisions will affect public health just as directly as they affect climate change, so please bring public health experts into higher-level roles at CARB.

I personally do not see how we are going to seriously reduce carbon emissions if we allow subdivisions to continue to sprawl into the countryside, ensuring people living there will have to drive long distances to go anywhere. Please contact me if I can be of any service.

James Sallis, PhD  
Professor of Psychology, SDSU  
Director, Active Living Research  
[www.drjamessallis.sdsu.edu](http://www.drjamessallis.sdsu.edu)

## References

Ewing R, Bartholomew K, Winkelman S, Walters J, Chen D. 2008. Growing Cooler: The Evidence on Urban Development and Climate Change. Washington, DC: Urban Land Institute.

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Handy S, Sallis JF, Weber D, Maibach E, Hollander M. 2008. Is support for traditionally designed communities growing? Evidence from two national surveys. *Journal of the American Planning Association* 74:209-221.

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Attachment: [www.arb.ca.gov/lists/sp-general-ws/311-nqls\\_results\\_flyer\\_020808.pdf](http://www.arb.ca.gov/lists/sp-general-ws/311-nqls_results_flyer_020808.pdf)

Original File Name: NQLS results flyer 020808.pdf

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

No Duplicates.

**Comment 135 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rodney  
Last Name: Proctor  
Email Address: rproctor@coloradoenergy.com  
Affiliation: Colorado Energy Managment

Subject: Colorado Energy Management's Comments on Draft Scoping Plan  
Comment:

Dear Chairman Nichols,

Thank you for the opportunity to provide comments on California's June 2008 Climate Change Draft Scoping Plan. Please see my attached letter for the recommendations from Colorado Energy Management.

Sincerely,  
Rodney Proctor

Attachment: [www.arb.ca.gov/lists/sp-general-ws/316-cem\\_submission\\_on\\_ab32\\_draft\\_scoping\\_report\\_-\\_7-31-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/316-cem_submission_on_ab32_draft_scoping_report_-_7-31-08.pdf)

Original File Name: CEM Submission on AB32 Draft Scoping Report - 7-31-08.pdf

Date and Time Comment Was Submitted: 2008-07-31 13:16:02

No Duplicates.

## **Comment 136 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Steven

Last Name: Keller

Email Address: [skeller@berkeley.edu](mailto:skeller@berkeley.edu)

Affiliation: UC Berkeley - School of Public Health

Subject: Make Laws not Suggestions

Comment:

Dear ARB:

Thank you for this opportunity to comment on the Draft AB 32 Scoping Plan. I just learned of the opportunity yesterday (7/30/08).

I have read through the Executive Summary and read the comments in the Transportation and Land Use areas as well. And surprisingly, by-and-large, I agree with most everyone's comments. I wish I had time to read through the entire 294 pages of the appendices, but the comment closing date looms too close.

First I'd like to thank everyone (governing bodies, agencies, businesses, and citizens) for their work on this, on AB 32, and all other Climate Change mitigation work. This is the most serious situation/problem of the modern era. These problems will take BOLD actions of governments and people alike, but the most important component is STRONG leadership of government. We can't take baby steps, we can't be protectionist for special interest (e.g. the Building or Auto Industries) - life itself hangs in the balance. And thus I want to say I support others in stating that our state government must take the leadership role in mandating a great many things to accomplish our goals to reduce GHG, and a host of other problems. I will be speaking here mostly on the very important subjects of Transportation and Land Use.

First I'd like to show my support to other comments made on the Scoping Plan (I will be paraphrasing to save space).

From the Land Use area:

L. Sadler - "...land use planning is the single most important aspect..."

S. Thomas - the State must "...step in to constrain local land use...make developers accountable...having strong state laws is the most equitable..."

C. Pirch - "...the state should direct infrastructure dollars to projects where local government land use plans meet AB 32 targets..."

L. Nock - "institute Smart Growth land use..."

M. Dempsey - "...remove financial incentives to develop in agricultural areas..."

K. Grimes - "...require Calif law and local land use regulations to favor low-carbon development..."

C. Chase makes many good comments and arguments in both of her

letters, one great statement I love and strongly support is, "...make an unequivocal commitment to State transit funding."

Additionally, T. Clark of the City of Hughson makes some very good counter arguments we should pay attention to.

In the Transportation area:

Here, there is one person I do have to disagree with. Mr. R. Tata suggests that we use "non-regulatory actions," but there are many example of how those do NOT work. Volunteer programs to promote changes in business or personal practices or habits just don't work. Take for example the Kyoto Protocol and Pres. Bush.

"The 1997 Kyoto Protocol would oblige ratifying countries to reduce carbon dioxide emissions according to set schedules, to minimize potential global warming. The pact has not taken effect, however.

The United States, the world's biggest carbon dioxide emitter, signed the agreement but did not ratify it, and the Bush administration has since withdrawn U.S. support, calling instead for voluntary emission reductions by U.S. industry and more scientific research into climate change." (2005 The Associated Press)

But according to a March 5, 2007, article in the Guardian UK, the US is on track to INCREASE CO2 output by 20% by 2050, so much for volunteer controls. Let me illustrate this more simply, if we didn't have to pay taxes, who would "volunteer" to do so? The only way to achieve our lofty, but necessary goals is through laws, mandates, restrictions, controls, and voluntary action. If we need to amend CARB to close loopholes or make it work for us, we should do that.

There need to be enforceable controls if we ever hope to make a difference in what we are doing to our planet. There must also be responsibility and accountability. Because, the bottom line is...all of this results in a major and serious situation...human health and well being (Public Health). Here is what Dr. Richard Jackson, Public Health and Environmental Design professor, and former Director of the CDC has to say on land use and transit.

In one of his research seminar series, Dr. Jackson, stated that in 2005, California lost over a quarter of a million acres of prime farm land to development - some 300,000 acres in just one year.

In the Summer 2007 issue of UC Berkeley's School of Public Health's, Public Health magazine Dr. Jackson says, "We need to create cities and towns that meet the planet's demands and our pocketbook needs for efficiency; places that allow a child or someone elderly, disabled or poor to meet their life needs for safety, autonomy, transport, access to healthy food and medical care, and to culture and community. We must stop pretending that if we build endless tract houses on fine agricultural land that these human benefits will magically spring up. Better habitation helped beat infectious disease; it can help to beat chronic disease epidemic as well."

By not fully developing infill space within urban settings we are seriously wasting our available and valuable space. I don't just mean land, but total SPACE - as well as endangering ourselves,

civilization, and all life.

In closing I'd just like to stress that we need to take bold and decisive action, and we need to take it now. We need strong and brave governmental leadership and laws with teeth to complete the task at hand. Let me leave you with a very old quote that still has resounding relevance today.

There is nothing more difficult to take in hand, more perilous to conduct, or more uncertain in its success, than to take the lead in the introduction of a new order of things. Because the innovator has for enemies all those who have done well under the old order of things, and lukewarm defenders in those who may do well under the new. - Niccolo Machiavelli

Lastly, here is a link to our website about bringing streetcars back to the East Bay. On the site you can find several papers and important reports that are worth taking a look at. Additionally, there are many links to local and regional organizations working with us to resolve these common issues and problems.

<http://www.reconnectingemeryville.com>

Thanx again,

Steven Keller - UC Berkeley, School of Public Health  
John Scheuerman - Design Engineer, Siemens - Planning  
Commissioner, City of Emeryville

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 13:33:55

No Duplicates.

**Comment 137 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Patricia  
Last Name: Fong Kushida  
Email Address: patfongkushida@sacasiancc.org  
Affiliation: The California Asian Pacific Chamber

Subject: AB 32 Draft Scoping Plan and its impact on small businesses  
Comment:

Dear Sirs:

As President and CEO of the largest ethnic chamber in the State of California I would like consideration as a committee member when formulating a small business advisory committee attached to this plan.

It is imperative that we have broad based community representation on this committee so that outreach and communication can occur as the impact of the proposals outlined in AB 32 become law.

Please contact me at:

Pat Fong Kushida  
President/CEO  
California Asian Pacific Chamber of Commerce  
2012 H Street, Suite 202  
Sacramento, CA 95811

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 13:50:08

No Duplicates.

## **Comment 138 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Monica

Last Name: Ramos

Email Address: mramos@ccstockton.org

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

Kudos to California for taking the first step. Now we need to do it right.

- Protect the interests of low-income communities
- Use funds generated by AB 32 to invest in "green jobs" and for training and education programs in low-income communities
- Don't give away free pollution credits to companies, especially those who created the problem in the first place! Those that helped create the problem now need to pay for the public costs of the pollution they created.

Thanks!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 13:58:32

No Duplicates.

**Comment 139 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lori  
Last Name: Ballance  
Email Address: lballance@gdandb.com  
Affiliation: John Wayne Airport

Subject: Comments on the Draft Scoping Plan (June 2008 Discussion Draft)  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/328-  
comment\\_ltr\\_on\\_ab\\_32\\_draft\\_scoping\\_plan\\_\\_07-31-08\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/328-comment_ltr_on_ab_32_draft_scoping_plan__07-31-08_.pdf)

Original File Name: Comment Ltr on AB 32 Draft Scoping Plan (07-31-08).pdf

Date and Time Comment Was Submitted: 2008-07-31 14:44:01

No Duplicates.

**Comment 140 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: bill  
Last Name: magavern  
Email Address: bill.magavern@sierraclub.org  
Affiliation: Sierra Club California

Subject: COMMENTS ON AB 32 DRAFT SCOPING PLAN  
Comment:

Sierra Club California commends CARB's tireless efforts in preparing this comprehensive, far-reaching draft scoping plan.

We believe this draft plan is moving in the right direction, and recommend further strengthening before it is finalized in November. Our volunteers and staff have prepared a full set of comments, presented below.

= = = = =

Generally, we recommend the following eight crucial GHG actions for CARB's plan:

- 1) Make big polluters pay for all their emissions. Program revenues should go toward clean technologies, green jobs, and cost-cutting measures for low-income consumers. CARB also should narrowly limit offsets.
- 2) Consider cap-and-auction just one tool among market mechanisms. Other tools should be brought forward more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda.
- 3) Give the 33-percent renewable electricity standard by 2020 the force of law, either through legislation or regulatory action.
- 4) Promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reductions.
- 5) Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins and electric cars) beyond CARB's currently too low projected levels.
- 6) Greatly strengthen the too-modest land use and agricultural sections of Plan.
- 7) Bolster requirements for zero waste and recycling, as well as Extended Producer Responsibility (EPR).
- 8) Ensure that actions to reduce greenhouse gases also help, whenever possible, to clean up California's unhealthy air.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/330-scc\\_comments\\_ab\\_32\\_scoping\\_plan\\_7.31.08.doc](http://www.arb.ca.gov/lists/sp-general-ws/330-scc_comments_ab_32_scoping_plan_7.31.08.doc)

Original File Name: SCC COMMENTS AB 32 SCOPING PLAN 7.31.08.doc

Date and Time Comment Was Submitted: 2008-07-31 15:17:30

No Duplicates.

**Comment 141 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joshua

Last Name: Harris

Email Address: [jharris@volkerlaw.com](mailto:jharris@volkerlaw.com)

Affiliation: Law Offices of Stephan C. Volker

Subject: CARE's Comments re Draft AB 32 Scoping Plan

Comment:

Please find the comments on the AB 32 Scoping Plan of Californians  
for Renewable Energy.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/333-arb\\_comments\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/333-arb_comments_scoping_plan.pdf)

Original File Name: ARB COMMENTS Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-07-31 15:22:54

No Duplicates.

## **Comment 142 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Ardath  
Last Name: Lee  
Email Address: alee@sonic.net  
Affiliation:

Subject: Comments on Scoping Plan  
Comment:

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, Ardath Lee

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 15:27:27

No Duplicates.

## **Comment 143 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Josh

Last Name: Richman

Email Address: jrichman@bloomenergy.com

Affiliation:

Subject: Inclusion of all-electric distributed generation (DG) technologies

Comment:

Bloom Energy would like to applaud the California Air Resources Board on the release of its scoping plan for the implementation of AB32. It is a bold first draft towards implementing a framework for California to establish itself as a global clean energy leader.

In addition to the current recommendations, we propose the following additional items to consider:

- 1) Promote the use of new ultra-clean distributed generation technologies in addition to the classic Renewable Portfolio Standard (RPS) and Combined Heat and Power (CHP) solutions.
- 2) Take additional measures to ensure that California captures the economic benefits of its environmental leadership.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/336-bloom\\_energy\\_comments\\_on\\_ab\\_32\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/336-bloom_energy_comments_on_ab_32_scoping_plan.pdf)

Original File Name: Bloom Energy Comments on AB 32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-07-31 15:44:09

No Duplicates.

## **Comment 144 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Erin

Last Name: Rogers

Email Address: erogers@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on draft scoping plan

Comment:

July 31, 2008

Mary Nichols, Chairperson  
California Air Resources Board  
1001 I St., P.O. Box 2815  
Sacramento, CA 95812

RE: AB 32 Draft Scoping Plan General Comments

Dear Chairperson Nichols and Members of the Board:

The Union of Concerned Scientists (UCS) is the leading science-based nonprofit working for a healthy environment and a safer world. UCS combines independent scientific research and citizen action to develop innovative, practical solutions and to secure responsible changes in government policy, corporate practices, and consumer choices.

UCS applauds the California Air Resources Board (CARB) for developing the nation's most comprehensive plan to date for reducing the pollution that causes global warming. While the plan is still a proposal, it represents the furthest step forward any state has taken in the fight against global warming. Many of the plan's policies will save consumers money and yield economic benefits. California is showing the rest of the country how to build a clean energy economy—creating jobs and using energy more efficiently, while at the same time protecting the environment and public health.

In particular, UCS is pleased to see that CARB recommends increasing the state's renewable electricity standard and cleaning up diesel engines. The Plan also indicates that CARB is considering a feebates program for cars and trucks that would provide incentives to consumers to buy, and manufacturers to make cleaner cars. We urge CARB to adopt feebates as a recommended measure and keep its recommendation for more renewables.

The plan contains provisions for a state and possible region-wide cap-and-trade program that would work together with other regulations to reduce global warming pollution. The plan appropriately recognizes that cap-and-trade is not a silver bullet; cap and trade accounts for 20 percent of the needed reductions, while the remaining 80 percent will come from direct regulations. UCS has significant concerns with two important cap-and-trade design elements: insufficient auctioning of

pollution allowances and the overuse of compliance offsets.

The draft Scoping Plan implies that the agency is considering auctioning less than half of the pollution allowances under a cap-and-trade system initially. Yet cap-and-trade systems work best when as many pollution allowances as possible are auctioned. Giving them away can create windfall profits for polluters and reduce opportunities to use auction revenue for investments in consumer protection and emission reduction efforts that fall outside the reach of the cap.

The draft plan suggests a too large a role for compliance offsets in AB 32 implementation. The suggestion that firms regulated under a cap-and-trade system could cover up to 10 percent of their emissions through offsets creates the disconcerting possibility that cap-and-trade would fail to produce any reductions in the capped sectors that are the program's primary target. Moreover, the draft plan proposes no geographic limits or other means to prioritize projects in California, creating the likelihood that some emission reduction projects would be outsourced under the proposed approach to offsets. This would be a missed opportunity and counter to AB 32's call for benefit maximization for the people of California. Carefully designed limits on offsets are important to construction of an effective cap-and-trade program and will promote investment in clean air, clean energy and greater energy security in California.

Below are more specific comments and recommendations on 33 percent renewable energy standard, diesel standards, feebates, and cap-and-trade design.

I. Strong Support for the 33 Percent Renewable Portfolio Standard  
UCS applauds the draft Scoping Plan's endorsement of a 33 percent by 2020 statewide Renewables Portfolio Standard (RPS), and urges CARB to keep the 33 percent RPS in the final AB 32 Scoping Plan.

The passage of AB 32 underscores the need for policy measures that will provide substantial in-state GHG reductions. A 33 percent RPS is not only consistent with our AB 32 goal, but will bring significant co-benefits to the state. These benefits include reducing air pollutants that harm public health, solidifying California's role as a leader in renewable energy development, invigorating the state's booming clean tech investment community, and creating a new source of "green collar" jobs. A 33 percent RPS will also put the electricity sector on the path to achieving the much deeper emission reductions required beyond 2020.

While a global warming cap-and-trade program may encourage some additional investment in renewable resources, a higher RPS mandate is essential to drive the changes in government policy, utility practices, and industry investment that are necessary to overcome the transmission, siting, and other market barriers to developing renewable energy in the state. In addition, a 33 percent RPS will provide a clear and long-term signal to the financial community to continue supporting infrastructure investments that will significantly increase the amount of renewable generation serving California. Achieving much higher levels of renewables will not happen organically - it requires a strengthened RPS policy that includes both a higher renewables mandate and statutory and regulatory reforms to encourage more renewables development.

The draft Scoping Plan's endorsement of the 33 percent RPS is also

entirely consistent with California's existing policy goals. In 2005, the Energy Action Plan II (EAP II) reinforced the Governor's stated goal of achieving 33 percent of electricity sales from renewable energy by 2020. Similarly, the California Public Utilities Commission (CPUC) instructed the state's three investor-owned utilities to identify planning decisions that must be made within their 2006 long-term procurement plans to achieve 33 percent renewables by 2020. Since then, the California Energy Commission (CEC), the CPUC, the California Independent System Operator (CAISO), and several federal agencies have undertaken studies and workshops to resolve the transmission, permitting, and grid reliability issues that must be overcome to achieve significantly higher levels of renewable energy.

We acknowledge that reaching a 33 percent renewable energy goal by 2020 is a tremendous challenge that will require unprecedented coordination among state agencies, policymakers, and stakeholders. UCS is committed to working diligently with these parties to help identify and overcome the barriers to increasing renewable energy in California. We are working with the Legislature to establish effective 33 percent RPS legislation that will benefit California consumers, stimulate economic activity within the state, and help California to achieve the goals of AB 32.

We commend CARB for its leadership in advancing clean energy to meet the goals of AB 32, and strongly support the inclusion of a 33 percent RPS for all load serving entities (LSEs) in the final Scoping Plan. If necessary, we suggest that CARB make an explicit plea to the legislature to amend the existing RPS statute to reflect the 33% recommendation in the Scoping Plan

## II. Diesel Standards and Goods Movement

We commend CARB for focusing attention on the goods movement sector for both early emission reductions and long-term global warming reductions from heavy-duty trucks, ships, and trains. Strategies that reduce global warming pollution from this sector can also provide substantial co-benefit emission reductions of NOx and particulate matter (PM), bringing significant public health benefits.

As noted in the staff analysis, heavy-duty trucks alone account for about 20 percent of all transportation related global warming emissions. CARB is moving forward with an early action measure targeting a subset of this truck population with requirements for improved aerodynamics and rolling resistance. Additional measures identified in the plan target hybrid technology and engine efficiency improvements separately. These measures will result in more efficient and lower emitting truck transport in California. However, this approach may fail to capture the full potential of technology advancements for heavy-duty trucks. Overall truck efficiency and global warming emissions are a combination of aerodynamic drag, rolling resistance, engine, and drive train efficiency. CARB should consider setting a global warming standard for new trucks that accounts for total truck performance in addition to component efficiency.

Improvement in the goods movement system as a whole will also be critical to meeting our 2020 and 2050 climate goals given the rapid growth in freight that is expected in the coming decades. Both efficiency measures and advanced technology solutions will be needed to meet these challenges. We support CARB carrying out a full assessment of emissions sources and reduction strategies for

the state's transportation corridors, ports, and railyards. The focus on ports and railyards is especially important given the potential of complimentary strategies to reduce toxic emissions and global warming pollution. Emission reduction plans for these facilities must be enforceable to ensure that progress is being made towards a lower carbon and less polluting goods movement system in California.

### III. Include Feebates as a Recommended Measure

UCS urges CARB to move feebates from a "Measure Under Evaluation" to a "Recommended Greenhouse Gas Reduction Measure" in the transportation sector of the Scoping Plan. Feebates is a powerful, yet flexible incentive program that affects both buyers and makers of automobiles. Economic studies have shown that feebates have the following benefits, which will lead to significant emissions reductions and consumer savings:

- A feebates program can work as a compliment to existing and future global warming regulations. Because a feebates program provides financial incentives for automakers to install clean technology, it motivates automakers to meet California's GHG regulations sooner.
- Feebates can achieve significant emission reductions in the medium duty passenger vehicle fleet, which are not covered by existing global warming regulations. Currently, the auto companies do not have any requirements to install emission reduction technologies on these vehicles.
- A feebates program will not only encourage automakers to make improvements in their vehicle fleet, but can engage the general public in the battle to combat global warming by offering direct incentives for consumers to make choices that help the environment.
- A feebates program is self-financing and, according to the CARB Scoping Plan, provides over a billion dollars in savings due to reduced fuel consumption.

Based upon these benefits and the 2-6 MMTCO<sub>2</sub>E in emission reductions from a vehicle feebates program, we strongly encourage CARB to adopt feebates as a "Recommended Greenhouse Gas Reduction Measure" and include medium duty passenger vehicles in the program. If necessary, we suggest that CARB make an explicit request to the legislature to authorize CARB to enact a feebates program.

### IV. Cap-and-Trade Proposal Needs Strengthening

The draft Scoping Plan provides a strong set of sectoral policies to do much of the "heavy lifting" to reach the state's 2020 and 2050 goals. With approximately 80% of the reduction coming from other measures, the draft Scoping Plan uses a broad cap-and-trade program to sweep up the last increment of reductions and to provide enhanced certainty that the needed economy-wide reductions will be achieved. The draft plan provides a cogent explanation of how sectoral polices can work in harmony with cap-and-trade as part of an economy-wide effort. In this way, the draft Scoping Plan advances the state of the art.

Though cap-and-trade is not a silver bullet, a well designed program could be a useful component in AB 32 implementation. Global warming has been called "the greatest market failure the world has ever seen" because markets currently ignore the costs imposed by the heat-trapping emissions that arise from our production and consumption choices. A cap-and-trade program would

put a price on those emissions. This would "internalize" pollution costs, providing an incentive to find the most effective and affordable solutions for global warming.

We have two major concerns about the proposed cap and trade structure. First, the proposal gives an overly expansive role for compliance offsets, undermining the integrity of the cap and the ability of CA to capitalize on the co-benefits of investment in clean technologies. Second, the proposal does not go nearly far enough with respect to auctioning as a method of distribution for allowances. The draft plan implies that auctioning will start at less than 50 percent.

#### Need for Effective Limits on Compliance Offsets

The outlines of a cap-and-trade program presented in the draft Scoping Plan are a step in the right direction, but there is substantial room for progress. Our greatest concern stems from the overly expansive role for compliance offsets that the draft plan proposes. The use of compliance offsets should be limited to a small fraction of the emission reductions that the cap and trade program is expected to achieve. Using a "limit" of ten percent of a firm's total emissions could allow 100 percent of the reductions from cap and trade to be achieved through offsets.\* Potentially all of the reductions that cap-and-trade seeks to achieve could be done through offsets, and no emission reductions whatsoever would necessarily occur in capped sectors. This would undermine what should be a guiding principle of cap-and-trade design: the program should yield meaningful reductions in capped sectors.

UCS supports a quantitative limit on offsets to be set at no more than 10 percent of estimated reductions from cap and trade. Whereas 10 percent of emissions implies that up to 40 million metric tons of reductions of carbon dioxide equivalent could be achieved through compliance offsets in 2020, a limit of 10 percent of reductions would imply an upper bound of about 3.5 million metric tons of carbon dioxide equivalent for offsets, or about one percent of allowances.

Additionally, though the Scoping Plan suggests that CARB might allow offsets to be used to comply with direct regulations, we urge CARB to state that offsets will not be necessary for compliance with any of the direct regulations included in the Scoping Plan.

Ineffective limits on compliance offsets such as those included in the draft Scoping Plan could lead to large outflows of capital through the outsourcing of emission reduction projects and related losses in economic and environmental benefits for the people of California. In contrast, carefully designed quantitative and geographic limits will demonstrate the benefits of climate action and will allow the Golden State to become a model of climate action, thereby inspiring action throughout the world. Effective limits on compliance offsets will promote:

- Clean air and public health benefits from investments in global warming solutions
- The realization of benefits from clean-tech investments and innovation in key (capped) sectors
- Meaningful reductions in high-emitting capped sectors and avoidance of costly lock-in of long-lived fossil-fuel technology
- The preservation of the option of linkage to other cap-and-trade programs that have chosen to limit offsets.

We provide additional information below on the potential co-benefits of limited offsets. Carefully limited offsets:

- Provide clean air and public health benefits for residents of California and the West. While reducing global warming pollution offers valuable climatic benefits in its own right, it will also provide many other important environmental benefits. When electricity providers, oil and gas companies, and other industrial sources reduce the amounts of global warming pollution that they produce, Californians will be exposed to lower levels of conventional smog-forming and toxic air pollutants as well. This improved air quality will in turn lead to better public health, lower health care costs, and higher levels of worker productivity and student performance. If offsets are allowed from anywhere in the world, which would be equivalent to the outsourcing of emission reductions project, then valuable health benefits will be lost.

At present, Californians are quite literally dying from dirty air.

The state has three of the five most polluted air basins in the country and the Los Angeles air basin has the worst year-round small-particulate pollution and the worst ozone levels in the country. CARB estimates that the policies cited in its draft Scoping Plan would reduce nitrogen oxides (NOx) emissions by 50 tons per day and the most dangerous kind of particulate matter by 10 tons per day. These reductions, according to CARB estimates, would result in 340 premature deaths avoided and a range of other public health benefits, with a combined economic value of \$1.5-\$2.4 billion in 2020. The Natural Resources Defense Council, which recently released its own assessment, concludes that the improvement in air quality and reduction in health care costs would be even larger, preventing more than 700 premature deaths and saving \$3.2-\$5 billion in 2020.

- Spur clean-tech investment, green-job development, and innovation. A 2004 survey of venture capitalists by Environmental Entrepreneurs found that one of the main reasons why they are motivated to invest in California's clean-technology industry is the state's strong climate policies. As a result, that sector is surging. In 2007, California garnered 45 percent of North America's venture capital investment in clean-energy technologies, or \$1.8 billion, up from \$1 billion in 2006. California last year attracted more venture capital in clean tech than did all of Europe combined. Carefully designed offset limits will help maintain this momentum, thereby preserving the rates of investment and innovation in California's clean-tech industries that will be the foundation of the future's low-carbon economy.

By contrast, overly permissive offset policies would shift emissions reductions from capped sectors to other sectors or to other geographic areas. Investor expectations on the future profitability of technological advances in the capped sectors would be reduced, thereby depressing investment. Moreover, the learning-by-doing and economies of scale that come with increased utilization would be lost. California's competitive advantage in the rapidly growing clean-tech global market should not be squandered; it makes much more sense to prioritize investment and innovation in clean tech—within the state, as opposed to essentially outsourcing—to take advantage of present opportunities. Another related ancillary benefit that results from progress toward a clean energy future is reduced reliance on

imported fossil fuels, greater insulating from volatile oil and gas markets and improved energy security.

- Ensure meaningful reductions and avoid lock-in to higher-emitting capital. The broad reach of the cap-and-trade program proposed in the draft Scoping Plan means that almost all fossil-fuel combustion (in transportation, electricity generation, and other industrial activities) will be capped. Carefully designed offset limits promote technological changes in capped sectors by forcing emissions reductions within those sectors instead of diverting the reductions to other sectors of the economy or to other geographic areas. The draft plan recognizes this important objective, stating that “[C]ARB is considering limiting the use of offsets... to help ensure a significant portion of required reductions come from within the state and within the regulated sectors” (p. 44).

However, the suggested quantitative limit does not square with this objective, as it implies that all of the reductions produced by capped sectors could come through offsets. The draft plan’s suggested allowable quantity of offsets (40 MMT) is actually greater than the reductions that the program is designed to achieve (35.2 MMT). With such an offset policy, opportunities for promoting investment in clean technology could be lost, resulting in costly lock-in to high-emitting capital that would make the eventual task of curtailing emissions far more expensive in the short timeframe we have left to avoid dangerous climate change.

- Preserve the option of linkage to other cap-and-trade programs that have chosen to limit offsets quantitatively. But linkage is unlikely in the absence of harmonization with those programs’ offset policies. The European Union Emission Trading Scheme in particular has signaled its intention to sharply curtail offsets in order to ensure that cap-and-trade provides the necessary impetus for a transition to a clean-energy future.

#### Support for 100% Auctioning of Allowances

UCS supports 100% auction as the preferred method of distribution for allowances under the cap. This position reflects the principle that the public owns the sky and that the pollution that causes global warming should have a price.

The draft plan does not go nearly far enough with respect to auctioning as a method of distribution for allowances. The draft plan implies that auctioning will start at less than 50 percent. While it suggests that auctioning will increase over time, the draft only commits to achieving a “majority” by auctioning in 2020. UCS recommends auctioning 100% of allowances. At a minimum we would hope that the final Scoping Plan will call for auctioning to be the primary method for distributing allowances from the outset and that it will call for a quick transition to 100% auctioning.

By distributing allowances via auctions, we can:

- Avoid Windfall Profits to Polluters

The allowances created under a tight cap are a valuable, scarce commodity that commands a market price. The European experience under cap-and-trade has shown that free allocation leads to

windfall profits in competitive markets. Giving away allowances to covered emitters does not protect consumers from price rises in competitive markets. Electric utilities and other covered emitters in Europe have been able to raise prices to consumers to reflect the market value of the allowances, even though they received them for free. The total value of allowances will far exceed the adjustment costs that business may face, and this is why unfair windfall profits result from giving away allowances. The National Commission on Energy Policy explains how windfall profits can come about: "Economic analysis and experience with Europe's trading system suggests that energy companies can and will pass most program costs through to consumers and businesses at the end of the supply chain. If the same companies get a large allocation of free allowances, the value of those allowances is likely to substantially exceed any actual net costs they incur as a result of the policy."

- Offer an Efficient Source of Revenue for the Public Benefit  
Revenue gained from auctioning permits enhances economic efficiency because it is gained by correcting the "externality" that has been associated with the lack of a cost for emitting global warming pollution. The revenues generated by an allowance auction can be used to invest in emission reductions outside of the cap-and-trade program, in particular measures that will assist energy consumers. It is particularly important the lower income households not endure disproportionate impacts, as these are the most economically vulnerable households. CARB lists a number of appropriate possible uses of revenue generated under AB 32 in the draft plan.

- Reward Early Action  
A policy of 100 percent auction will reward those who have taken early action to reduce their emissions. Businesses that create less global warming pollution per unit of production would have to purchase fewer allowances, placing them at a competitive advantage. By contrast, a system that allocates free allowances based on emissions could fail to reward these "good" actors.

- Create a Level Playing Field  
Auctions allow new firms entering the market to compete on a fair and equivalent basis with existing firms, with the same access to allowances.

- Help Create Administrative Simplicity and Lower Transactions Costs  
Allocating allowances for free would set in motion a time-consuming and costly process of lobbying and negotiation over which businesses, institutions, and individuals would get how many allowances.

- Support a Transparent, Well-functioning Market and Price Discovery  
The auction of allowances is an effective way to provide clear, timely information about the market value of these allowances, which helps firms make informed decisions about future production and investments. Moreover, auctioning should contribute to lower price volatility. Suppliers of allowances (those who may have received or purchased excess allowances) can be late in entering the market, or they may simply hold onto their excess allowances as a hedge against the possibility that allowance prices might rise in the future. On the other hand, those who need to buy allowances (the "demanders") would tend to enter the market first

and place an immediate value on allowances. This can quickly create a price spike due to a mismatch in market information. Once suppliers see the high price, they may enter the market in large numbers, causing a price crash. This kind of scenario and the resultant price volatility have been observed in the EU ETS context. Price stability and early price discovery will be important to developing a successful, smoothly operating market.

The design of a California cap-and-trade program can benefit from lessons learned from the experiences of other similar programs. When the European Union launched its Emissions Trading System in 2005, virtually all the allowances were distributed for free. In the U.K., this led to electric power generators reaping windfall gains of about \$2.5 billion in 2005. A World Wildlife Fund report estimates that in Germany windfall profits in the electricity sector will range from \$46 billion to \$94 billion by 2012. In contrast, as ten states in the U.S. Northeast prepare to launch the Regional Greenhouse Gas Initiative (RGGI) in January 2009, almost every state that has decided how to distribute allowances under the program has wisely opted for 100 percent auctioning of emission allowances. The minimum amount of auctioning that will occur under RGGI is 90% in Maryland.

Free allocation does not dampen price effects; auctioning does not increase allowance prices. The European experience with emission trading has shown that regulated entities will pass along the value of an allowance, the opportunity cost of not selling it, when possible regardless of how it was acquired. Allowance prices will reflect the number of allowances and the underlying demand for allowances, which in turn will reflect the relative ease of making reductions. And it is this allowance price that is independent of the method of allocation that will determine the opportunity cost associated with using a permit. How to understand this intuitively? Consider the cost of a ticket to the World Series. Would you expect a scalper to sell a ticket to you for a lower price if s/he got it for free? Almost certainly not. Therefore, the public interest will be served by auctioning allowances and using this revenue for the benefit of consumers.

UCS supports 100% auction in the electricity sector, which is a patchwork of publicly or consumer-owned utilities and investor-owned utilities operating under cost-of-service regulation. Auction revenue can be substantially returned to consumers via the utility that serves them for investments in efficiency and other investments that reduce the pollution that causes global warming. NRDC/UCS have conceptualized a "use it or lose it" approach to revenue recycling that returns some auction revenue to the service area from which it originated, thereby avoiding geographic wealth transfers.

#### Scope

UCS supports a broad cap-and-trade program including transportation fuels from the start. There are at least four advantages to a broad scope for cap-and-trade that includes transportation fuels.

- It extends a hard cap across a much larger part of the economy.
- The price response increases over time and is significant in the long run.
- A larger market with more actors will be more resistant to attempted manipulation.
- Encourages efficiency via a consistent price signal across all

high emitting sectors.

- Creates a specific quantitative cap for a key sector

An advantage of including transportation fuels is that it extends a hard cap to this important sector. This feature can be contrasted with other policies that can improve energy intensity but do not guarantee a particular level of reductions.

- Provides the right long run incentives

The long-term price response can be expected to be significant. In a recent working paper that he submitted to the WCI, UC Berkeley Professor Lee Friedman makes the point that with the increasing availability of alternate fuels, both the long run and short run elasticity should increase over historical experience. We add that the addition of public transit options would have the same effect, making it easier for people to change their behavior in response to a change in prices. In the long run, including transport fuels can play a useful role in contributing to smart growth. In this way, including transportation fuels can contribute to putting us on a path to meeting our long run objectives. 2020 is an arbitrary milestone along in a longer journey toward much deeper reductions. Moreover, including transportation in cap-and-trade program early on when the reductions are more modest could help keep costs relatively low in these initial years.

- Creates a more secure market

The larger market would make market manipulation more difficult as more players and more allowances would be involved.

- Efficient investment across sectors.

As the Cal EPA Market Advisory Committee (MAC) observed, a program with comprehensive coverage of all major emitters will send a price signals across all relevant sectors of the economy. This will encourage efficient investment decisions. There is also an element of fairness in equal treatment (i.e. inclusion) of all high emitting sectors.

Though we present these arguments for including transportation fuels, we cannot emphasize strongly enough that the most cost effective strategy for achieving significant emissions reductions will combine inclusion of the transportation sector in a cap and trade program and complementary policies such as low carbon fuel standards, light duty vehicle efficiency standards, heavy duty efficiency improvements, anti-idling enforcement, alternative fuel promotion, and specific smart growth policies.

#### Cap Level within Cap-and-Trade

The draft offers a preliminary recommendation for the 2020 cap level: 365 MMT for capped sectors. Our initial assessment suggests that such a cap level would provide a good foundation for achieving AB 32's mandated reductions for the economy as a whole. We urge CARB to ensure that the initial 2012 cap is set below 2012 BAU projections and is based on emission levels in some year prior to 2008. Given problems of over-allocation in previous cap-and-trade programs (RECLAIM, EU ETS Phase 1, possibly RGGI), this is a crucial decision.

The proposal from the WCI recommends that the level of the cap for the first compliance period be set at the level of emissions expected in 2012 under a business as usual scenario, meaning that capped entities could avoid any emission reductions through 2012.

This raises great concerns. The path to the 2020 reductions will be smoothed by getting started on the task as early as possible. There is no time to waste.

#### V. Cumulative Impacts

UCS is pleased that the draft Scoping Plan commits to analyze all of the measures in the plan for impacts they will have on air pollution and public health (ES-2, 4, p.10). We look forward to seeing the results of those analyses and any subsequent revisions made to the plan based on the results.

Before the Scoping Plan is finalized, we encourage CARB to do the following:

- Assess, as accurately as possible, the co-pollutant increases or decreases associated with the five scenarios that have thus far been the subject of economic modeling. Based on these assessments, estimate the statewide and, to the extent feasible, local health impacts that may occur as a result for each of the five scenarios. We concur with the EJ Advisory Committee recommendation that outside health experts should be consulted to assist with the assessment of health impacts.
- Determine, as accurately as possible, the co-pollutants changes and resulting health impacts associated with each policy under consideration for the Scoping Plan (as would be required for determining cost-effectiveness). Use this information to determine how impacts would differ amongst mixes of policy choices.
- State in the Scoping Plan how CARB plans to accomplish the more detailed screenings that are required for each proposed regulation and market mechanism before it is implemented. (These screenings are spelled out in Health and Safety Code 38562 (b) (1-9) and 38570 (b) (1-3) and include not disproportionately impacting low-income communities, not interfering with achieving air quality standards, maximizing total benefits to California, etc. ).
- State in the Scoping Plan that analytical tools and data sets needed will be updated periodically in consultation with outside experts and the EJ Advisory Committee.
- Clearly state in the Scoping Plan that no regulation or market mechanism included in the Scoping Plan will be implemented unless it has undergone the aforementioned screenings and meets the requirements established in 38562 (b) (1-9) and 38570 (b) (1-3).

#### Cumulative Impacts Screenings

CARB should conduct a cumulative impacts assessment to identify geographic areas that currently bear a higher pollution burden using the best available data and tools, including the Cumulative Impacts Screening Tool being developed by a team of university researchers in conjunction with CARB. This will give CARB a snapshot of communities that will need to be protected from potential increases in pollution due to future implementation of climate policies. Such a screening is only a first step in the design of state climate policies. CARB should use currently available information to identify communities with a higher pollution burden prior to the completion of the Scoping Plan.

Additional cumulative impacts screenings for the areas identified in an initial screening as disproportionately burdened

communities--using a new tool or an adaptation of an existing tool that can extrapolate the future impacts of a proposed policy or set of policies-- will need to be conducted before any regulations are implemented. These screenings should inform decisions about which climate policies are implemented and how such policies are designed to assure that already-burdened communities will not be impacted by increases in pollution.

#### VI. Incentives for Expansion of the Voluntary Renewables Market

UCS supports an "off-the-top" rule similar to that included in RGGI to ensure that voluntary renewable energy generation and purchases will result in global warming emission reductions. We support the proposal put forth by CEERT and CRS on this topic: "With this approach, providers of voluntary renewable energy products (such as utilities with voluntary green pricing programs, competitive marketers of renewable electricity or RECs, individuals and organizations who generate some or all of their own electricity demand using onsite renewable generation technologies) will notify the Program Administrator of their projected voluntary demand for the upcoming year. The Program Administrators will convert the MWh sales projection to tons avoided carbon dioxide and remove this quantity of allowances from the entire pool available. Each year, parties providing voluntary renewable energy would document their actual sales or generation and the Program Administrator would retire a commensurate amount of allowances. At the end of the allowance compliance period, any difference between projected renewable energy sales and actual renewable energy sales would be trued up. As the market for renewable energy is a regional and national market, each state should adopt consistent policies in order to not create barriers or market anomalies that reduce the incentive for the development of new renewable energy facilities. There should be no caps on the amount of allowances available for the voluntary renewable market."

#### VII. Reporting, Monitoring, and Enforcement

While we understand that the Scoping Plan development process is a large undertaking and in this context it is reasonable to expect that some details will remain undecided, the extent to which the cap-and-trade program does its job will depend on many specific yet to be decided with respect to enforcement, monitoring, and how AB 32's "no back sliding" provisions for market mechanisms will be guaranteed. These are just a few important areas where much more work needs to be done.

Finally, because of the magnitude of the emissions reductions called for under AB 32 and the varying levels of certainty attributable to each emissions reduction program, we call on CARB to develop a total set of emission reduction programs that will reach the AB 32 cap while taking into account that possibility that some programs may fall short as to their expectations. The broad scope of the proposed cap-and-trade program reduces the risk in this regard. Nonetheless, CARB should address the role of uncertainty and how unexpectedly high emissions in uncapped sectors such as forestry and agriculture would be managed.

In summary, we commend CARB for its tremendous effort implementing AB 32. We welcome the opportunity to work together as this extremely important and cutting edge work on global warming proceeds. Please don't hesitate to contact us on any of the matters discussed in these comments.

Sincerely,

Erin Rogers  
California Climate Program

Attachment: [www.arb.ca.gov/lists/sp-general-ws/337-ucs\\_scoping\\_plan\\_general\\_comments\\_7-31-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/337-ucs_scoping_plan_general_comments_7-31-08.pdf)

Original File Name: UCS scoping plan general comments 7-31-08.pdf

Date and Time Comment Was Submitted: 2008-07-31 15:58:46

No Duplicates.

**Comment 145 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Marice

Last Name: Ashe

Email Address: [mashe@phlpnet.org](mailto:mashe@phlpnet.org)

Affiliation:

Subject: Comments on Climate Change Draft Scoping Plan

Comment:

Attached please find a comment letter on the AB 32 Scoping Plan from Public Health Law and Policy. I have also e-mailed this letter to [ccplan@arb.ca.gov](mailto:ccplan@arb.ca.gov).

Attachment: [www.arb.ca.gov/lists/sp-general-ws/338-phlp\\_comment\\_letter\\_on\\_scoping\\_plan\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/sp-general-ws/338-phlp_comment_letter_on_scoping_plan_to_carb.pdf)

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

Date and Time Comment Was Submitted: 2008-07-31 16:01:58

No Duplicates.

**Comment 146 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: HAZEL

Last Name: DONAT

Email Address: hmdonat@att.net

Affiliation:

Subject: reduction in greenhouse gases

Comment:

We need to Implement AB 32. Reducations of greenhouse gas is  
beneficial in providing reduced criteria air  
pollutants and toxic air contaminants in communities  
across the State of California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 16:20:11

No Duplicates.

**Comment 147 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kate  
Last Name: Miller  
Email Address: kmiller@actransit.org  
Affiliation: AC Transit

Subject: Draft Scoping Plan  
Comment:

Please see a copy of our letter detailing our interests and concerns about the Draft Scoping Plan and the implementation of AB 32.

Thanks very much.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/343-draft\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/343-draft_scoping_plan_comments.pdf)

Original File Name: Draft Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-07-31 17:11:04

No Duplicates.

**Comment 148 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lorraine  
Last Name: Wenzler  
Email Address: momwenz@yahoo.com  
Affiliation:

Subject: Clean Air  
Comment:

As a member of the Stockton Diocese Catholic legislative Network, I want you to make sure that low-income communities are not harmed. Funds generated by AB 32 need to be used to generate "green Jobs", training and education programs in low-income communities. We stongly oppose giving away free pollution credits to companies. Make sure polluters pay the full cost of the pollution they create.

Lorraine Wenzler

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 19:48:15

No Duplicates.

## **Comment 149 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Veroncia  
Last Name: Jacobi  
Email Address: vjacobi@sonic.net  
Affiliation: Santa Rosa Councilmember

Subject: AB 32 scoping  
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 travelled.

I am grateful to be serving on the Santa Rosa City Council where I can make local efforts for Climate Recovery.

Please consider these recommendations on behalf of myself, David Gougler, Stefanie Como and Becky Como (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: 2008-07-31 21:59:34

No Duplicates.

## **Comment 150 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Lilian

Last Name: Lee

Email Address: lilian2004@gmail.com

Affiliation:

Subject: Livestock is a major greenhouse gas source

Comment:

I was excited for your fast response on the hot issue of global warming, was 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, eutrophication 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](http://www.fao.org/newsroom/en/news/2006/1000448).

Livestock sector is a major greenhouse gas source. Please do not ignore it. Thanks for your hard work.

Lilian

Attachment: [www.arb.ca.gov/lists/sp-general-ws/354-toarb-072908.doc](http://www.arb.ca.gov/lists/sp-general-ws/354-toarb-072908.doc)

Original File Name: toARB-072908.doc

Date and Time Comment Was Submitted: 2008-07-31 22:00:19

No Duplicates.

**Comment 151 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Frank

Last Name: Gray

Email Address: fgray4birds@aol.com

Affiliation:

Subject: Comments on draft Scoping plan

Comment:

See attached comments on plan. Thank you- Frank Gray

Attachment: [www.arb.ca.gov/lists/sp-general-ws/355-frank\\_gray\\_comments\\_on\\_ab\\_32\\_scoping\\_plan\\_\\_july\\_31\\_\\_2008.doc](http://www.arb.ca.gov/lists/sp-general-ws/355-frank_gray_comments_on_ab_32_scoping_plan__july_31__2008.doc)

Original File Name: Frank Gray Comments on AB 32 Scoping Plan, July 31, 2008.doc

Date and Time Comment Was Submitted: 2008-07-31 22:06:06

No Duplicates.

**Comment 152 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Anna  
Last Name: Callahan  
Email Address: annacal@berkeley.edu  
Affiliation:

Subject: Carbon Fees Not Cap and Trade  
Comment:

Dear CARB:

I have read materials written by Laurie Williams and Allan Zabel of [www.carbonfees.org](http://www.carbonfees.org), including their recent July 11th article in California Energy Circuit at <http://www.californiaenergycircuit.net/displaystory.php?task=show&sid=3227&un=&ut=&pd=&seid=1216287069>

My comment is that CARB should not use cap-and-trade to address climate change and should select carbon fees on all fossil fuels at the point when they enter the California economy. All fees should be promptly rebated, per-person, to all California taxpayers. See the Williams/Zabel editorial and website at [www.carbonfees.org](http://www.carbonfees.org) for the reasons that this will be a more effective and efficient way to transition to a post-fossil fuel economy.

Thank you for considering my comment.  
Anna Callahan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 23:03:40

No Duplicates.

## **Comment 153 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Ruth  
Last Name: Cole  
Email Address: ibruth2@earthlink.net  
Affiliation:

Subject: Assembly Bill # 32  
Comment:

Dear Sir or Madam,

We call on the Air Resources Board, the California Department of Food and Agriculture, and city and county governments to adopt a wide range of policy, regulatory, research and funding measures that support:

Organic, water-and-energy-efficient sustainable farming practices;

Local food production, distribution and consumption, especially to meet the needs of under served low-income communities; and  
On farm production of wind and solar energy.

These practices will reduce greenhouse gas emissions and provide many additional benefits, including increased tax revenue for cities and counties, better air and water quality, improved farm worker and public health, reduced medical costs, and the creation of local green collar jobs. Further, one recent paper concluded that "Organic, sustainable agriculture that localizes food systems has the potential to mitigate nearly thirty percent of global greenhouse gas emissions and save one-sixth of global energy use."

We understand that there are a range of regulatory and market based options available to the State Government to curb greenhouse gas emissions. Given their lack of effectiveness in other regions, we do not support Cap and Trade and Cap and Auction-based approaches. We are supportive of approaches that:

Effectively, rapidly and efficiently reduces carbon emissions in the timeframe outlined by law;  
Do not increase the emissions of other health harming pollutants;  
Have strong enforcement mechanisms, including criminal and civil consequences for entities that violate regulations, as well as large emitters of carbon pollution  
Ensure we transition completely away from a fossil-fuel based economy that disproportionately harms low-income communities and communities of color to one that is efficient and run on sustainable energy technologies;  
Are democratic, meaning that Californians have a say in all major efforts to reduce carbon emissions;  
Support early and current adopters of low-carbon practices, such as today's organic farmer and cities and counties enacting carbon action plans, and

Do not give away free or drastically cost-reduced polluting rights to big polluters.

We look forward to an implementation of the California Global Warming Solutions Act that supports a low-carbon, sustainable and just food system with meaningful, effective and democratic regulatory approaches.

Thank you,

Ruth Cole

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 23:26:58

No Duplicates.

## **Comment 154 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

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

Subject: Urgent: Go Veg, Be Green, Save the planet  
Comment:

Thanks for your hard work!

According Food and agriculture Organization of United Nation(<http://www.fao.org/newsroom/en/news/2006/1000448/index.html>), 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.

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

I would like to share more information with you. Please go to the below websites.

1. <http://www.ecofoodprint.org/climate.html>
2. <http://www.suprememastertv.com>

We have a shot time and few chances to save our planet. I believe you will do very well on it. Thanks for all you affords.

Sincerely

Lucy Li

Attachment: [www.arb.ca.gov/lists/sp-general-ws/358-to\\_arb-073108.doc](http://www.arb.ca.gov/lists/sp-general-ws/358-to_arb-073108.doc)

Original File Name: to ARB-073108.doc

Date and Time Comment Was Submitted: 2008-07-31 23:27:41

No Duplicates.

## **Comment 155 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Debra

Last Name: Birkinshaw

Email Address: cognizant2@hotmail.com

Affiliation: Sonoma County Conservation Action

Subject: Scope plan

Comment:

Please fine-tune: 1. Make big polluters pay for all their emissions. Program revenues should go toward clean technologies, green jobs, and cost-cutting measures for low-income consumers. CARB also should narrowly limit offsets.

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

3) Give the 33-percent renewable electricity standard by 2020 the force of law, either through legislation or regulatory action.

4) Promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reductions

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 23:31:05

No Duplicates.

**Comment 156 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Edward  
Last Name: Mainland  
Email Address: emainland@comcast.net  
Affiliation: Sierra Club California

Subject: Comprehensive Comment Package: Sierra Club California  
Comment:

COMMENTS ON AB 32 DRAFT SCOPING PLAN, CALIFORNIA AIR RESOURCES  
BOARD, July 31, 2008

BY SIERRA CLUB CALIFORNIA

Contact: Bill Magavern, Director 916-557-1100 x 102  
bill.magavern@sierraclub.org

California Air Resources Board Members and Staff:

Sierra Club California commends CARB's tireless efforts in preparing this comprehensive, far-reaching draft scoping plan. We believe this draft plan is moving in the right direction, and recommend further strengthening before it is finalized in November. Our volunteers and staff have prepared a full set of comments, presented below.

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Generally, we recommend the following eight crucial GHG actions for CARB's plan:

- 1) Make big polluters pay for all their emissions. Program revenues should go toward clean technologies, green jobs, and cost-cutting measures for low-income consumers. CARB also should narrowly limit offsets.
- 2) Consider cap-and-auction just one tool among market mechanisms. Other tools should be brought forward more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda.
- 3) Give the 33-percent renewable electricity standard by 2020 the force of law, either through legislation or regulatory action.
- 4) Promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reductions.
- 5) Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins and electric cars) beyond CARB's currently too low projected levels.
- 6) Greatly strengthen the too-modest land use and agricultural sections of the Plan.
- 7) Bolster requirements for zero waste and recycling, as well as Extended Producer Responsibility (EPR).
- 8) Ensure that actions to reduce greenhouse gases also help, whenever possible, to clean up California's unhealthy air.

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OVERALL COMMENTS:

- We are pleased that the draft Plan seeks not only to meet the law’s requirement of rolling back our greenhouse gas emissions to 1990 levels by 2020, but also sets a pace of greenhouse gas (GHG) reductions adequate to meet the scientifically established goal of an 80% reduction by 2050.
- Scientists now suggest that goal itself may be inadequate. We suggest the Plan incorporate intentional redundancies that anticipate the possibility that urgent action is more pressing than current assumptions would indicate.
- CARB’s Plan may wish to make explicit that a “cap” on GHGs may not entirely be commensurate with the scale of the problem. We must first reduce the growth of CO2 emissions; next reduce total CO2 emissions; next reduce the growth of total CO2; and then go beyond that to reduce total CO2 in the atmosphere.
- California cannot afford delay in reducing pollution that causes global warming. The potential costs of inaction or delayed action are much greater than the cost of implementation now.
- We support the inclusion of co-benefits, such as public health improvements and better energy efficiency, from GHG reductions.

Comments by section: (page numbers refer to pages in draft Scoping Plan)

II. PRELIMINARY RECOMMENDATIONS

A. ROLE OF THE STATE: SETTING AN EXAMPLE (p. 12)

- We support efforts to get the State to lead by example, and encourage immediate implementation of all the actions listed, plus more to be identified.

B. EMISSIONS REDUCTION MEASURES

1. California Cap and Trade Program Linked to Western Climate Initiative (p. 15)

Direct Emission Reductions: We are glad that the Plan proposes that most of the required emissions in GHGs will come from performance standards that directly reduce emissions, such as California’s clean car, renewable energy, and energy-efficiency programs, and incentive programs like the Solar Initiative, with only 21% proposed for the Cap-and-Trade Program. If possible, we would like to see that percentage made even lower.

- If California establishes a cap-and-trade program, we strongly recommend it require 100% auction in order to be fair to everyone, including consumers and producers.
- Revenues raised by fees and/or auctions should go toward clean energy technologies, public transit, environmental mitigation, green jobs, and aid for low-income consumers. We’d also like to see that funding used to provide training in renewable energy job skills for people now working in the fossil fuel industry.
- Aligning with the Western Climate Initiative (WCI) could dilute California’s program and result in fewer emissions reductions and more delays, unless California can bring other states up to higher standards than WCI is currently recommending. The WCI Draft Design Recommendations on Elements of the Cap-andTrade Program states (WCI page 15): “The WCI recommends each Partner auction a minimum percentage, between 25 percent and 75 percent, of its allowance

budget." If California agrees to this, it could mean that between 25% and 75% of emissions allowances will be given away for free to the biggest polluters in the state.

- The WCI proposal creates an enormous loophole by allowing all reductions through 2016 to come from offsets, rather than direct reductions in capped sectors. CARB should require power and oil companies to invest in renewable energy and cleaner transportation rather than to pay someone else in some other jurisdiction to reduce their pollution instead. Any offsets should be limited in number and subjected to rigorous criteria (See more discussion below in Section C-3).
- We are also concerned about how WCI's recommendations for cap-and-trade and offsets relate to concerns of the environmental justice community: Will offsets be international? Will this amount to "exporting" GHG emissions overseas? We note that among WCI member states California is the only state with an official environmental justice advisory committee for climate issues, and we are disturbed by the failure of the WCI process to attend to EJ concerns.
- California should not allow emissions trading with any jurisdiction that does not have a hard emissions cap of AB 32-like stringency because such trading would remove the assurance that our emissions reductions were real. The WCI proposed baseline of 2012 would create a perverse incentive to drive up emissions between now and then, which is the opposite of the action needed.

- No trading in emissions should be allowed if it causes hot spots that exacerbate air pollution at the local level, especially within communities already beset by environmental justice issues.

- Aggressive steps need to be taken to guard against leakage by measuring the carbon emission of electrical generation consumed in CA at its actual point of production.

- Every product manufactured in the world today has its own carbon footprint—the carbon emissions associated with the production of that product. To maintain a fair market for California goods, CARB should require that producers of emission-intensive products imported for consumption in California purchase the same emissions allowances that California producers must when they sell their products in the same market. Similarly, emissions associated with products produced in California but exported should be allocated to the exporting state or nation rather than California. Any other principle would solely disadvantage California industries and act as a powerful lever for driving additional jobs offshore.

## 2. California Light-Duty Vehicle GHG Standards (p. 20)

- We support implementation of the Pavley "Clean Cars" standards, which continue to call for reduction of global warming pollution from personal vehicles. While the Pavley standards will help us to meet 2020 requirements for greenhouse gas reductions, California needs more improvements in vehicle technology before 2020 in order to meet our 2050 goals. The state should immediately begin a dramatic shift toward plug-in hybrid electric vehicles and battery electric vehicles to begin the ramp-up needed to meet 2050 greenhouse gas reduction goals. This should be stated specifically in the Plan to make sure it is implemented.

- The state should immediately create a Battery Electric Vehicle Partnership with industry to speed the electrification of its light-duty vehicle fleet.

- The minimum goal of 7,500 Zero Emission Vehicles (ZEVs) currently required by the Zero Emission Vehicle Program in 2012-2014 is grossly inadequate. CARB should establish a goal of

hundreds of thousands of ZEVs in that timeframe, and recommend increased funding for immediate development of plug-in hybrid vehicles and infrastructure for all plug-in vehicles.

- CARB should create a program and incentives to encourage conversion of the 100,000 hybrids now in use to plug-in hybrids, and mandate all appropriate state fleet vehicles be plug-in or zero-emission vehicles.

### 3. Energy Efficiency (p. 21)

- We support all the energy efficiency efforts listed by CARB. In fact, we believe that even greater reductions in the pollution that causes global warming can be gained by further strengthening efficiency and conservation efforts.

- For example, the Plan's goal of 32,000 gigawatt-hours of electric power demand reduction by 2020 falls far short of the economic potential for 60,000 gigawatt-hours of savings if all technology options are included (as described in the California Energy Commission 2007 Integrated Energy Policy Report, p. 98).

- The mandatory Green Building Standards Code update scheduled for 2010 needs to be strengthened. CARB pressure could help.

- Can CARB provide more detail in terms of the three measures in CR-1 (separate out the expected reductions from the three strategies outlined)?

- By 2020, California should be able to go well beyond the SB 1470 goal of only 0.1 million tons of annual reductions from solar water heating, through encouraging public private partnerships.

- CARB should look at using independent providers and the Standard-Offer model to administer energy efficiency implementation, as opposed to utilities. The California Public Utilities Commission investigated this in 2002 and concluded that independent providers were more cost effective, particularly for residential customers.

### 4. Renewables Portfolio Standard (p. 24)

- We are pleased to see CARB's recommendation for a 33% Renewables Portfolio Standard for electricity providers. This forward-thinking measure should be quickly given the force of law for all utilities, either by regulatory action or by legislation.

- Community Choice Aggregation (CCA) allows city and county governments to pool the electricity-buying power of all local customers, which could help meet (or even exceed) the 33% renewable energy level. CCAs in advanced development stages, such as Marin County and San Francisco, include 51% renewable requirements in their plans. CCA is one of the most powerful GHG reduction measures available to cities and counties to comply with their responsibilities under AB 32. CARB's scoping plan should spell out CCA authority as a key tool provided under California law (AB 117, Migden) that grants local governments full power in planning for their energy supply.

- CARB should also recommend restructuring state law to allow more favorable renewable energy price structures, such as feed-in tariffs, which ensure full compensation for renewable energy costs, plus a fair rate of profit.

- Feed-in Tariffs (FiTs) need explicit backing in CARB's scoping plan. FiTs are efficient tools for speeding adoption of renewable electricity generation and stabilizing market prices of new technologies. Already used in more than 37 countries, and under consideration in Michigan, Minnesota, Illinois and Rhode Island, FiTs establish a price for renewables – guaranteed for 20 years or more – based on the cost of producing that electricity plus a fair

profit. These rates usually have a modest impact on customer bills compared to conventionally generated electricity. (In Germany, for example, the FiT cost to consumers equals the price of a loaf of bread per month.) FiTs allow manufacturers and renewable project developers to predict demand, and to invest with confidence. California should model its FiTs on those programs that have achieved significant growth of renewables. A FiT in California should be tied to meeting the state's goals for renewables.

- As the California Energy Commission's recommended in its 2007 Integrated Energy Policy Report, any carbon trading system reduce allowances according to an appropriate evaluation of the effects of the renewable portfolio standard – in order to avoid oversupply of allowances. 5. Low Carbon Fuel Standard (p. 25)

- We are looking forward to implementation of a Low Carbon Fuel Standard that accounts for all environmental impacts on a life cycle basis.

- However, we are disappointed that the draft Scoping Plan contains no explicit projections for carbon reductions from implementation of a rigorous Zero Emission Vehicle (ZEV) program. An ambitious ZEV program, plus plug-in hybrids, could achieve significant GHG savings.

- The plan should include specific requirements for automakers to sell hundreds of thousands of zeroemission vehicles annually by 2020.

#### 7. Sustainable Forests (p. 27)

- Because forests remove carbon dioxide from the atmosphere and sequester carbon in vegetation as well as wood products, forests can make important contributions to reduction of greenhouse gasses in the atmosphere.

- In general, the Plan sets very modest targets for contribution from the forest sector. We encourage CARB to set a more aggressive goal. As indicated in appendices, the 5 MMTCO<sub>2</sub>E target is essentially what the forest sector is currently contributing in terms of GHG reduction. We can do better.

- Sierra Club California has serious concerns about essentially delegating the development of a plan for the forest sector to the Board of Forestry, Department of Forestry and Resources Agency. We strongly urge CARB to assert and maintain a leadership role in the forest sector. History has shown, time and again, that Board of Forestry is unlikely to take the necessary bold and visionary steps to solve this (or any other) serious problem.

- It should be remembered that three of the nine seats on Board of Forestry are reserved for the timber industry, and are currently held by employees of Sierra Pacific Industries, Timber Products Company, and Hearst Corporation. A fourth seat is designated for Range & Livestock, and is held by a former Farm Bureau lobbyist. These four members who directly represent the regulated community generally vote as a block, and stonewall any proposals that may run counter to the economic interests of their constituents.

- There is also a substantial question as to what extent the Forest Practice Act empowers Board of Forestry to address climate change issues. Indeed, Section 4513 of the Act states the intent of the California Legislature as follows:

"4513. Intent of Legislature. It is the intent of the Legislature to create and maintain an effective and comprehensive system of regulation and use of all timberlands so as to assure that: (a) Where feasible, the productivity of timberlands is restored, enhanced, and maintained. (b) The goal of maximum sustained production of high-quality timber products is achieved while

giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, regional economic vitality, employment, and aesthetic enjoyment.”

The Board of Forestry’s proclivity toward inaction and catering to the interests of the timber industry, combined with its lack of clear authority to adopt regulations addressing climate change and carbon sequestration, lead us to believe that it would be more appropriate for CARB to adopt the rules necessary to achieve appropriate contributions from the forest sector.

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Comments on Specific Recommendations in the Scoping Plan  
Appendices

Forest Practice Rules Mechanisms:

Improvements to California’s Forest Practice Rules to address wildlife and water quality issues can also lead to additional carbon sequestration. For example, there is currently an Emergency Rule Petition pending at the Board of Forestry that would improve habitat protections for critically endangered coho salmon. Amongst other changes, the rule package would require retention of additional large trees near watercourses to provide shade, and allow large wood recruitment into streams to improve the complexity of stream structure. These rules would also lead to permanent retention of additional carbon.

CEQA Mechanism:

It is widely acknowledged that the conversion of forestland to other uses has substantial adverse impacts on habitat, water quality and carbon sequestration. Unfortunately, the current regulatory process has substantial weaknesses that prevent adequate state-level oversight. The current regulatory process needs to be strengthened to discourage conversion of forestland, and to require substantial mitigation when forests are converted to other uses. Reducing forestland conversions will have the related benefit of managing the ever-increasing fire suppression challenge in California, which is seriously exacerbated by development in and near forestland.

Implementing Strategies:

Forest Biomass:

Forest biomass for heat and power can provide positive carbon benefits compared to fossil fuels. When gathering biomass from forests, it is critical that the biomass be a byproduct of thinning the forest to create a healthier stand condition, rather than harvesting a healthy forest simply for biomass.

Afforestation/Reforestation:

Improving the stocking of depleted or poorly managed forestland, and replanting historic forestlands, are important and obvious ways to improve California’s carbon sequestering capacity. However, these activities should be approached with prudent planning and analysis. A warming climate will change the distribution and composition of California’s forests, and the frequency and intensity of fire is likely to increase.

Tree-planting activities should take these and other factors into account, and create a distribution and density of native species that reflects an appropriate balance between carbon sequestration and resiliency to changing climate and fires.

Urban Forestry:

Planting trees in urban environments offers myriad co-benefits: aesthetics and increased property values, reduced energy consumption due to increased shade, cleaner air, and increased carbon sequestration. Although the amount of carbon directly sequestered may not be as large or as cost-effective as afforestation efforts in rural parts of the state, an aggressive urban tree planting program should be a priority forest sector action.

Fuels Management:

California is a fire-adapted landscape, and fire is an inevitable and necessary part of California's ecology. The appropriate focus for fire policy in California is how we can co-exist with fire, minimizing risk of injury and loss of property while respecting ecological realities.

Sierra Club supports the thinning of excessive surface and ladder fuels near homes and communities to protect lives and property from wildfires. Fire science indicates that reduction of understory fuels is the most important factor in preventing a stand-replacing crown fire, and we have supported a number of statutory and regulatory changes in recent years to streamline the reduction of these types of fuels from priority areas.

California's sheer size, the relatively low value of wood products in the current market, and the extremely high price of diesel fuel all contribute to the need to prioritize areas meriting fuels reduction activities. Scattered fuel reduction projects across the landscape are generally going to be less effective than targeting areas of highest risk. These also tend to be the communities where firefighters must use direct attacks to control a fire to protect property.

There have been a number of estimates of the carbon benefits from fuels reduction activities and the resultant reduction in fire severity. Some, including those from CalFire, vastly overestimate the benefits of fuels reduction activities. Given the extremely speculative nature of this "benefit," and the fact that fire is a natural and necessary part of California's environment, we encourage the state to focus fuels reduction efforts (and other proactive fire planning activities) on protecting communities. There may be climate cobenefits to fire planning and suppression, but trying to quantify them is difficult, highly questionable and should be omitted from any accounting.

Finally, CARB must include the effects of increasingly large emissions from forest fires in its projections for forest emissions/reductions.

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8. Water (p. 28)

- We support a public goods charge for funding investments in water efficiency that will lead to reductions in greenhouse gases.

- We are pleased that CARB staff calls for a 20% reduction in water use but disappointed that agricultural water use is not included among the efficiency targets. Agricultural water use accounts for more than three quarters of the state's total water use. 9. Vehicle Efficiency Measures (p. 29)
- We are supportive of vehicle efficiency measures, such as fuel-efficient tire standards. 10. Goods Movement (p. 29)
- We support the ship electrification in ports approved by CARB in 2007.
- Requiring on-dock electric rail and electric drayage would eliminate all diesel emissions inside the port.
- We want to know more details of the Plan's proposed "Goods Movement Efficiency Measures - System-Wide Efficiency Improvements," which CARB has predicted will yield savings of 3.5 tons.
- CARB should work with state transportation agencies to plan commercially viable electric rail systems that would replace diesel trucks and trains. That move would also reduce congestion along California's highways, potentially lowering total vehicle emissions.

#### 11. Heavy/Medium-Duty Vehicles (p. 30)

- We support all three proposals for aerodynamic efficiency, hybridization, and engine efficiency.
- We request that ARB consider requiring electrification of medium-duty delivery trucks, as well as other means to reduce emissions in this sector.

#### 12. Million Solar Roofs Program (p. 30)

- We support the Million Solar Roofs Program and its goal of 3,000 megawatts of solar energy for homes and businesses throughout the state by 2017. We note, however, that some reforms in program structure and funding may be necessary to achieve the goal.

#### 13. Local Government Actions and Regional Targets (p. 31)

- The Plan should do more than just "encourage" local city and county climate action plans. This planning should be "required" (the Attorney General has already sued San Bernardino to underline this requirement's urgency).
- This should not be an unfunded mandate: most cities lack funding and expertise to craft adequate climate plans. CARB should take the lead in devising incentives - carrots and sticks - and means of financially assisting or persuading cities to comply.
- The Plan should include stronger measures to reform land use planning in ways that reduce vehicle miles traveled (VMT). (See Newman and Kenworthy paper on how one passenger-mile of transit use can reduce 3-7 passenger-miles in a car.) Expand Regional Blueprints already underway.
- These should include transit-oriented development, walkable, bikeable communities, mixed land uses, requiring Regional Transportation Plans to have strong requirements for reduction of vehicle miles traveled (VMT), and more.
- We are concerned with how this section of the Plan deals with land use measures. The Plan's land use goals are not ambitious enough. Targets are too modest. Tools identified to cope with the problem are inadequate. And serious reflection of public health, social and economic co-benefits of forceful action is lacking.
- The Plan only counts reducing 2 million metric tons (MMT) of carbon equivalent per annum by 2020 from actions in this sector. This is only about 1% of the total reductions. By comparison, the Sacramento Area Council of Governments (SACOG) blueprint could

reduce carbon emissions by roughly 1 MMT by 2020, even though SACOG currently contains no more than 1/15th of California's population.

- It is unclear why CARB acquiesced to only 2 MMT for the Plan, which virtually equals business as usual. An April 2007 Cal/EPA report, "Climate Action Team Proposed Early Actions to Mitigate Climate Change in California, Draft for Public Review," allotted 18 MMT by 2020 to "regional transportation/smart growth land use measures."
- More compact neighborhoods and less driving are the essence of the EIR for SACOG's Blueprint scenario. SACOG plans to devote much less land devoted to urban uses and to cut carbon emissions while saving farmland - providing public health and economic savings for households and businesses where less driving is required.
- Although the Plan mentions "Community Energy" and "municipal utility operations," there is no mention of Community Choice Aggregation (CCA), a specific authority under California law (AB 117, Migden). CCA offers large potential for local governments to move aggressively toward meeting or exceeding the state's mandated Renewable Portfolio Standards (RPS). Over 40 cities and counties in the state have performed feasibility studies financed by the California Energy Commission and the US Department of Energy, with over two dozen jurisdictions in advanced stages of planning for actual implementation. Marin County, Oakland, Berkeley and Emeryville, as well as San Francisco have either established or are considering a target of 50% or more renewables for all customers within their service region by 2017. When achieved, such targets represent the single easiest way for municipalities to comply locally with whatever AB 32 stipulations may be imposed.
- Adopt and require the use of greenhouse performance standards, goals and metrics for transportation planning and projects. Hold state, regional and local agencies accountable for meeting these metrics.
- We recommend fast-tracking regional mass transit infrastructure, including Bus Rapid Transit programs (especially on existing freeway HOV lanes). 14. High Speed Rail (p. 34)
- Sierra Club has long endorsed the Altamont Pass route into the Bay Area.
- CARB is aware of the ongoing controversy over Altamont and Pacheco Pass routes. We urge CARB to advise the High Speed Rail Authority on the relative carbon footprints of competing routes into the Bay Area, and to assess the relative degrees of cost-effectiveness in reducing carbon when constructed. To the extent that CARB can bring to bear climate considerations and data on this choice, the public will be well served.

#### 15. Recycling and Waste (p. 34)

- CARB's scoping plan should highlight more aggressively the powerful carbon reduction potential of zero waste: first, reducing waste by design in manufacturing process, then reusing, recycling or composting products.
- ETAAC submitted to CARB an excellent set of recommendations for the waste sector but only several were included in the Plan. We strongly urge CARB to include ALL the ETAAC recommendations for the waste sector.
- We commend to you the new report "Stop Trashing the Climate," released June 5, 2008 to mark World Environment Day. See <http://www.stoptrashingtheclimate.org/> The report, by GAIA with the Institute for Self Reliance and Eco-Cycle, brings together information about recycling, plus source reduction, reuse and composting. Further, it describes how scaling up recycling,

reusing materials and products, and shrinking the size of a community's waste stream can greatly reduce greenhouse gas generation and related climate damage:

"Incinerators and landfills are relics of an unsustainable past that have no place in our green economy. The report, "Stop Trashing the Climate" shows that zero waste -- that is, preventing waste and strengthening recycling and composting -- is one of the fastest, cheapest and most effective strategies for confronting global warming." - Carl Pope, Executive Director, Sierra Club

- CARB should implement "lifecycle tracking" of manufactured products, giving priority to reusables and locally manufactured items.
- Landfill waste disposal should be phased out by requiring recycling and making manufacturers responsible for the end-of-life disposition of their products. Wastes should be separated, particularly organic wastes, for effective composting. CARB should work with the California Integrated Waste Management Board to end the practice of dumping green waste into landfills.
- Alternative Daily Cover (ADC) that uses green waste or wood waste should not be given recycling credits or counted as recycling. This actually de-incentivizes diversion of green waste into composting and contained methane energy capture.
- CARB's suggestion to capture and utilize landfill methane gas should not be construed as support for continued dumping of green waste into landfills. Landfill capture of methane is far less efficient than what is possible with green waste separation. This is especially crucial given that methane is a far more potent greenhouse gas than carbon dioxide.
- Burning garbage arguably uses more energy than recycling, and carbon reduction requires better options.
- We propose statewide installation of "Resource Recovery Parks" to include facilities for reusing, recycling, composting, and minimizing the discarding of materials. They can also incorporate facilities for repair services, retail sales of reclaimed products and landscaping supplies, organically composted gardens, educational tours, and public amenities. Such a model park currently operates in the city of Marina in Monterey County.
- We believe there are many more tons of carbon reductions possible from aggressive Zero-Waste and recycling programs. For example, the plan should include specific measures to increase recycling of organics and other materials, and those measures should have emission reduction numbers and deadlines attached to them.
- Extended Producer Responsibility (EPR), now CIWMB policy, needs explicit CARB backing as a potent greenhouse gas reduction measure.
- CARB should explicitly reject carbon credits for landfill carbon sequestration.
- Successful Zero Waste initiatives require effective outreach and educational programs so that others are advised of and can come to appreciate the benefits. CARB should utilize the legions of young people who are not only enthusiastic and care about waste reduction, recycling and global warming but are also willing to go out and do something about it. CARB should have these individuals help us educate our communities about the issue. Recycling ambassador programs throughout state and local government agencies should be instituted so that students and other volunteers can go door to door educating residents about the need for and the benefits of recycling. In addition, new home

owners, apartment dwellers and other residents should receive information after moving to a new residence that explains to them the recycling policies in their neighborhood and encourages them to do so. People are willing to do what it takes to pitch in but if they have no idea how to do it, they won't even begin. This type of outreach should be a critical aspect of the CARB plan.

16. Agriculture (p. 35)

- We are extremely disappointed with the low expectations for agriculture. CARB's Plan only mentions 1 potential MMT of GHG reduction from methane capture at large dairies.
- Many studies by California scientists and others throughout the world have shown how organically grown crops have significantly lowered GHG emissions, from non-use of nitrate fertilizers and other means.
- Studies have shown significant methane emissions from bovine digestion, which raises the question of whether a carbon tax should be applied to dairy products, such as beef and milk.
- Support for urban agriculture should be considered, especially community gardens.
- In Department of Conservation's study of greenhouse gas emissions associated with conversion of agricultural land to urban uses, both direct and indirect emissions should be considered. Promoting more compact, efficient, transit-oriented urban development will not only reduce greenhouse gas emissions from vehicle travel but also conserve agricultural land by minimizing conversion to urban use.
- The Plan should reference and encourage CDFA's development of a strategic plan for agriculture. Efforts to minimize conversion of prime farmland will be helped if agricultural enterprises now on the land maintain profitability and sustainability.
- The Plan should emphasize that linking good land use with local food systems can reduce transportation-related emissions, provide a premium for farmers selling locally, and even improve access to healthier foods.
- State and local governments could increase access to local foods, for example, by direct investments, incentives and public-private partnerships to develop needed local foods system infrastructure.
- Joint action by the Department of Food & Agriculture and CARB could significantly increase the amount of locally produced food consumed in the state - thus reducing more emissions from transportation. CDFA and CARB could work together to track and measure "food miles traveled" and seek ways to cut distances from food to producer. Cutting down on transport of agricultural products from agriculture areas to other parts of the state would lessen GHG.
- Support for urban agriculture should be considered, especially community gardens.
- The Plan should address urban agricultural issues, such as: a) What funding can the state supply to assist municipalities in supporting urban agriculture? b) What focus can CARB bring on removing barriers to urban agriculture? CARB and CDFA could work together to: find useable land for community gardens, inventories of such land; test for toxicity; reach out to potential urban gardeners; recast city regulations in favor of urban orchards, edible landscaping, local composting, and rooftop gardens; and provide more UC Master Gardener training and technical assistance? c) Could CARB facilitate funding of local offices in each municipality to inventory potentially available state-owned lands and mobilize local community gardeners and organizers?
- The Plan needs to highlight the greenhouse gas reduction

benefits of organic agriculture. The California Energy Commission Climate Change Research Conference Sacramento, September 10-13, 2007 has five presentations:  
[http://www.climatechange.ca.gov/events/2007\\_conference/presentations/index.htm](http://www.climatechange.ca.gov/events/2007_conference/presentations/index.htm)  
1

- Data from The Rodale Institute's long-running comparison of organic and conventional cropping systems confirms that organic methods are far more effective at removing the greenhouse gas, carbon dioxide, from the atmosphere and fixing it as beneficial organic matter in the soil. See Laura Sayre, 2003  
[http://www.newfarm.org/depts/NFfield\\_trials/1003/carbonsequest.shtml](http://www.newfarm.org/depts/NFfield_trials/1003/carbonsequest.shtml)
- Another study shows confirmed ecological virtues of organic farming [www.pnas.org/cgi/reprint/103/12/4522.pdf](http://www.pnas.org/cgi/reprint/103/12/4522.pdf)
- <http://news-service.stanford.edu/pr/2006/pr-organics-030806.html>

#### 17. Energy Efficiency and Co-Benefits Audits for Large Industrial Sources (p. 36)

- We support CARB's plan to require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits.
- However, we are disappointed that no specific measures, including performance standards, efficiency programs, or direct regulations are proposed for industry, which is projected to emit 101 MMTCO<sub>2</sub>E in 2020.
- California's industries (and CARB) could learn from Japan. "According to the International Energy Agency, based in Paris, Japan consumed half as much energy per dollar worth of economic activity as the European Union or the United States, and one-eighth as much as China and India in 2005." (NY Times, July 4, 2008)
- High efficiency co-generation needs to be required for all appropriate new energy installations.

#### C. OTHER MEASURES UNDER EVALUATION (p. 37)

##### 1. Other Sector-Based Measures (p. 37)

- We are supportive of all the measures listed as "under evaluation."
- We suggest that mandatory employer parking cashout, like that implemented by the city of Santa Monica, be added as an additional measure to evaluate. Employer parking cashout rewards employees that opt for transit, carpooling, and other smart transit choices.
- Many other ways to reduce workplace vehicle-miles-traveled (VMT), such as parking fee increases, telecommuting, etc. that need further study. • We are pleased with the mention of public education in regard to transportation. • We suggest that increasing public transit services (both bus and rail) be included among the sector-based methods.
- We urge CARB to insure that electric power generators be held to an increasingly stringent carbon standard, and that the carbon standard be applied to all generators, whether under contract or utility owned, and to all types of retail sellers of electricity within the state.
- We think CARB's target of reducing coal generation 40%, or 13,000 gigawatt-hours, by 2020 is an achievable goal, provided that utility companies are held to the renewable energy and efficiency targets.
- Industrial boilers, oil refineries and glass manufacturing

represent excellent opportunities to recover waste heat for electric generation and other purposes.

- -CARB staff might consider a recent study by Jason E. Bordoff and Pascal J. Noel, "Pay-As-You-Drive Auto Insurance: A Simple Way to Reduce Driving Related Harms and Increase Equity" ([www.brookings.edu/~media/Files/rc/papers/2008/0417\\_payd\\_bordoff/0417\\_payd\\_bordoff.pdf](http://www.brookings.edu/~media/Files/rc/papers/2008/0417_payd_bordoff/0417_payd_bordoff.pdf)).

Applied to California, the analysis indicates much larger benefits than estimated in the Plan

(<http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>). This emission-reduction estimate is about ten times larger than the Plan states, and the Plan overlooks co-benefits such as congestion reductions, crash reductions and consumer benefits.

- Here are a few of the study's key findings. (The full paper will be posted on the Brookings Institution website shortly):
  - An 8 percent driving reduction for light-duty vehicles - VMT decrease by 24 billion miles;
  - Less fuel consumption by 1.2 billion gallons, based on 2006 levels.
  - Direct annual CO2 reductions of 10.5 million metric tons
  - Lower premiums for drivers; two-thirds of households would save money.

- CARB should consider and address the full life cycle of emissions whenever possible. Unfortunately, the CPUC's interpretation of SB 1368 would allow about five million tons of GHG per year per Liquid Natural Gas terminal to go into the atmosphere without being "counted" as part of the state's carbon emissions, if these terminals are constructed. That's a loophole that should be closed: five million tons of GHG per year is roughly equivalent to the emissions of one million cars.

## 2. Carbon Fees (p. 41)

- We are pleased that CARB has provided a positive discussion of carbon fees. We think that the range recommended in the draft Plan of \$10 and \$50/ton would be reasonable; this fee could start low and gradually increase over time as needed.

- A \$30-per-ton fee on all greenhouse gases would provide revenue of approximately \$12 billion per year, which is less than 1/100th of the California economy. This money could be immediately restored to the state economy, encouraging local investment in clean technologies and green jobs, activities with a bright prospect in a carbon-constrained world. Revenues could also provide rebates for low-income consumers.

- We believe that it should be possible to quantify some of the benefits from the expenditure of the funds on projects that provide considerable GHG emission reductions. For example, transit operators know increased frequency of service and lower fares can increase ridership. Recovering waste heat, either to generate electricity or from generating electricity, has specific value to commercial and residential utility customers.

- On carbon pricing, emissions fees should be analyzed along with a cap-and-auction system, as the Plan proposes. We need the income to fund CO2 reductions.
  - Polluters always should have to pay for cleaning up the damage they cause. Therefore, if a carbon market is established, all emission allowances should be auctioned. The Plan states (page 16), "These allowances could be freely distributed to capped firms or auctioned in the trading market." We are opposed to free distributions, since they don't encourage accountability and provide much less motivation to reduce GHG emissions.

- Major emitters should pay for the cost of administering this program.

- Sierra Club has supported the existing criteria pollutant Indirect Source Rule (ISR) for the San Joaquin Valley. CARB should

now consider a statewide ISR that includes greenhouse gases. In order for ISR to be effective in reducing VMT, it should discourage developers from building far from existing services and jobs, and it should encourage close-in development. To this end, the amount of the fee should be proportional to the VMT, and the computer model used to compute a project's emissions should accurately account for the individual project's VMT. As a means of encouraging green building, reducing energy use, and promoting good community design measures such as mixed use and walkability, such an ISR should follow the precedent set by the existing ISR to incorporate fee reductions for onsite GHG reduction measures. Remaining fees should be used for projects that reduce GHG as well as criteria pollutants and achieve other environmental co-benefits.

- Lawrence Frank's new study, *Reducing Global Warming and Air Pollution: The Role of Green Development in California* (July 1, 2008, prepared for Environmental Defense Fund), is very supportive of ISR. CARB's AB 32 Scoping Plan lists ISR as "under evaluation."

- ISR is tested and effective and should be listed in part B of the Plan as an emission reduction measure.

### 3. Offsets (p. 43)

- Any offsets should be limited in number and subjected to rigorous criteria. The draft CARB Scoping Plan suggests limiting offsets to 10 percent of a firm's "compliance obligation." CARB must clarify that this means that no more than 10 percent of the emitter's required reductions may come from offsets, not 10 percent of its total emissions.

- We are opposed to any system that would relieve any domestic emitter of carbon from paying for their fair share of the costs of the carbon they emit in exchange for "offsets," either for internationally produced CO2 emissions or domestically for activities designed to enhance carbon sinks, like tree planting. While government and private support of improved soil carbon content and reforestation are highly desirable, it is impossible to retain the integrity and effectiveness of a program to reduce domestic CO2 emissions if it is combined with a trading mechanism for efforts to preserve and enhance carbon sinks.

- We oppose trading between sources of carbon pollution and sinks, like forests, that store carbon. The ability of forests to store carbon should not become a justification for maintaining higher emissions of air pollution. We need both 80% reductions in domestic CO2 emissions and strong programs to enhance carbon sinks; we should not "trade" them off against each other. This separation of carbon control systems is especially important given the increasing vulnerability of California's forests and other flora owing to fire, drought and potential effects of climate change.

### 4. Use of Possible Revenues (p. 45)

- We are supportive of most of the uses listed, particularly those related to environmental justice, such as "achieving environmental co-benefits."

- Criteria and toxic air pollutants create health risks, and some communities bear a disproportionate burden from air pollution. We support ideas that benefit these unfairly impacted communities.

- Revenues should be prioritized for projects that reduce both GHG emissions and also provide reductions in air and other pollutants that affect public health.

### III. ANALYSIS: Costs and Benefits (p. 49)

While more detailed comments will be developed later in our comments on the Appendices, specific economic benefits of energy efficiency and clean energy measures can be evaluated based upon the sum of: 1) projected and avoided costs for these energy supplies, 2) in-state jobs and manufacturing due to green economic activity, 3) federal tax credits benefits and in-state tax revenues, 4) export revenues, and 5) environmental and public health benefits.

- CARB's analysis of public health benefits of transportation efficiency measures focuses only on respiratory medicine and economic benefits of reducing respiratory disease. While this analysis provides powerful support for the Plan's vehicle and fuel improvements, the Plan overlooks large public health benefits to other transportation efficiency measures not in the Plan.
- Public health perils such as obesity, diabetes and heart disease can be reduced by strategies the Plan should embrace more aggressively. Auto-dependent neighborhoods make these diseases more common; smart growth and reduced vehicle miles traveled can help combat them.
- CARB's public health analysis needs to address the issue of food security and "food deserts." Lacking healthy food choices, residents must travel long distances to obtain more healthy fare or rely on expensive, locally available junk food. Although emissions benefits of better access to healthy food may be modest, public health benefits can be significant and climate change policy offers a chance for low-income "food deserts" to get attention.
- Gaps in the public health analysis in the Plan may stem from lack of participation by California Department of Public Health in the CAT process. We hope CDPH and the larger public health community are brought into the process of revising the Plan's first draft.

### IV. IMPLEMENTATION: Putting the Plan into Action (p. 65)

#### A. Personal Action (p. 65)

- We are pleased with the inclusion of Personal Action items.
- We believe the plan needs to include specific personal actions (coordinated with Public Outreach and Education campaigns, described below).

#### B. Public Outreach and Education (p. 67)

- All four strategies are excellent.
- Funding is needed for training teachers in the climate change curriculum.
- The Plan should include detailed public awareness campaigns, with budgets (funded by carbon fees), that will be used to involve the public in all aspects of the Plan.
- Successful implementation of California's historic global warming law will require a program that is open and transparent to the public, including performance and compliance tracking information of all components accessible via the Internet.

#### C. Tracking Progress (p. 68)

- We are supportive of the measures proposed for tracking progress.

#### D. Enforcement (p. 70)

- We agree that enforcement is a critical component of AB 32 implementation. CARB will need to significantly bulk up its

enforcement resources to meet this challenge. In addition, the scoping plan should explain the route for enforcing emission reduction measures taken by other agencies outside CARB to hold those agencies accountable for assuring the realization of emission reduction measures assigned to them.

- We support the measures proposed for enforcement, especially including engaging local Air Quality Districts in tracking emissions from local facilities.
- We would support some program funding to these Air Quality Districts to support their increased duties under AB 32.

E. State and Local Permitting Considerations (p. 70)

- We support including state and local permitting considerations in the AB 32 implementation strategies.
- We would support some program funding to the entities involved to support their increased duties under AB 32.

F. Program Funding (p. 71)

- We support the measures proposed for program funding.

V. A VISION FOR THE FUTURE (p. 73)

- We support collaboration with key partners, as long as it doesn't dilute the effectiveness and speed of implementation. California needs to stand up for a high standard of GHG reductions, not sink to the "lowest common denominator."
- We applaud the planned expansion of research by California's universities to develop innovative solutions to all aspects of the plan, but we cannot wait for the "perfect technologies."

(For further detail on Sierra Club California's positions, see: <http://www.sierraclubcalifornia.org/globalwarming.html>.)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 23:32:04

No Duplicates.

## **Comment 157 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Lucy

Last Name: Li

Email Address: lightlig4@yahoo.com

Affiliation:

Subject: Change diet to vegetarian to stop global warming

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://al.godsdirectcontact.org/your_food)

<http://www.vegsources.com>

<http://www.vrg.org>

<http://www.vegsoc.org>

Thanks for your hard work!

Sincerely

Lucy Li

Attachment: [www.arb.ca.gov/lists/sp-general-ws/363-arb-080108.doc](http://www.arb.ca.gov/lists/sp-general-ws/363-arb-080108.doc)

Original File Name: ARB-080108.doc

Date and Time Comment Was Submitted: 2008-08-01 00:51:30

No Duplicates.

## **Comment 158 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Karen

Last Name: McDonough

Email Address: karen.mcdonough@sanjoseca.gov

Affiliation:

Subject: City of San Jose Comment

Comment:

The goals and regional targets found in the Draft Scoping Plan are not aggressive enough to reach the reduction goals that have been discussed by experts in the field to mitigate for climate change. Many of the leading cities have goals well below the regional targets. Raise the target goals for local government actions.

More effort should be made to provide a more thorough analyses and recommendations on how local government can reduce green house gas emissions in all listed categories. Many categories are left with little to no quantification.

The City of San Jose, as a member of Green Cities California supports making Climate Action Plans mandatory for all California cities if funding can be provided to help cities develop their plans and implement pilot studies that are beneficial to others in the state. The City will not support an unfunded mandate.

Cities need to have readily available data in a format consistent with the protocol from resource agencies. Specific data includes energy and water usage by customer category, local and regional transportation data and waste disposal and diversion data. Please help facilitate making this data annually available.

The City of San Jose also supports and incorporates as reference comments made by Green Cities California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 01:16:57

No Duplicates.

## **Comment 159 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Roy  
Last Name: Nakadegawa P.E.  
Email Address: rnakadegawa@myfastmail.com  
Affiliation: TRANDEF

Subject: Comments on ARB AB 32 Climate Scoping Plan  
Comment:

Subject: Comments on ARB AB 32 Climate Scoping Plan  
July 30, 2008

Mary Nichols, Chair,  
California Air Resources Board ,  
Sacramento, CA 95814

Dear Chair Nichols:

Knowing that Cities produce seventy-five percent of all the world's greenhouse gas emissions, while the US consumes major portion of petroleum production and emits sixth of the worlds greenhouse gases while comprising of twentieth of its population, reducing emissions will require strong measures and changes in lifestyle.

As a 32 years former Elected AC Transit and BART Director, active with TRB 20+ years, retired 37 years Public Works Engineer and traveled widely outside North America over dozen trips examining developments. It is clear that we need to coordinated and integrated developments for most all their major urban areas emit fare less Greenhouse Gases whereas, the Bay Area produces 50% of its GHG from transportation alone.

Curitiba, Brazil is an excellent prime example where 40% of the total trips are by transit! They accomplished this by carefully coordinating development to transit. They also developed a regional land use plan that reduced flooding from storms, developed regional parks, improved waste recycling and improved overall well being for their citizens from this comprehensive coordinated regional plan.

Currently Curitiba has one of the highest income per capita with highest per capita auto ownership in Brazil yet they still managed to have 90% of the peak hour travel via transit. Moreover, I understand that Curitiba emission is 30% per capita of what we emit.

This was accomplished under great leadership using a comprehensive coordinated regional plan.

AB32 is an excellent bill that should include where cities comply to similar comprehensive coordinated regional plan that includes more Transit Oriented Development that reduces the demand on the use of the auto. Included with the integrated TODs, it should

impose a tax on excessive parking, unbundled parking on use of property, establish maximum parking ratio rather than minimum and emphasize walkability which will materially reduce GHG.

I have examined TODs in Sweden and Japan where a town center with department stores including public offices are built around a rail station and parking is treated as a secondary access mode which is moved several blocks from the station.

Some of the large buildings in Japan even have installed dual water systems that use recycled water for non-potable needs.

So, I believe as a primary focus we need to consider an integrated comprehensive coordinated regional land use development plan that includes transit along with various other forms of recycling if we are to reduce GHG to any degree.

Sincerely,

Signed Roy Nakadegawa P.E.

Roy Nakadegawa P.E.  
751 The Alameda  
Berkeley, CA 94707  
Ph. 510-526-5094  
e-mail; rnakadegawa@myfastmail.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 02:23:07

No Duplicates.

## **Comment 160 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Paula  
Last Name: Zerzan  
Email Address: pzerzan@comcast.net  
Affiliation:

Subject: AB Draft Scoping Plan, California Air resources Board  
Comment:

COMMENTS ON AB 32 DRAFT SCOPING PLAN,  
CALIFORNIA AIR RESOURCES BOARD

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, Paula Zerzan, 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.
- I 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.

Generally, I recommend the following eight crucial GHG actions for CARB's plan:

- 1) Make big polluters pay for all their emissions. Program revenues should go toward clean technologies, green jobs, and cost-cutting measures for low-income consumers. CARB also should narrowly limit offsets.
- 2) Consider cap-and-auction just one tool among market mechanisms. Other tools should be brought forward more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda.
- 3) Give the 33-percent renewable electricity standard by 2020 the force of law, either through legislation or regulatory action.
- 4) Promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reductions.
- 5) Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins

and electric cars) beyond CARB's currently too low projected levels.

6) Greatly strengthen the too-modest land use and agricultural sections of Plan.

7) Bolster requirements for zero waste and recycling, as well as Extended Producer Responsibility (EPR).

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

The state of California is facing a public health crisis, experiencing 14-24,000 premature deaths from air pollution yearly, 350,000 asthma attacks and 2 million missed school days from children suffering asthma attacks, thousands of hospitalizations and emergency room visits, and reduced lung function growth in children.

I urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments. The plan should also include additional strong regulatory measures on industrial sources to reduce emissions from petroleum refineries, power plants, cement manufacturers, and others sources.

It is vitally important the plan demonstrate that the variety of proposed measures will not only make rapid progress toward reducing greenhouse gases, but will also provide local benefits to communities in terms of improved air quality and public health.

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 02:37:12

No Duplicates.

## **Comment 161 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Gina

Last Name: Padilla

Email Address: ginapadilla476@comcast.net

Affiliation:

Subject: Cleaner Air In California

Comment:

I Stronlgy believe that more agresive laws to pertaining to A Smoke Free Enviornment is the key to this problem. Begining with the Smog Pollutants, their should be a series of inspections conducted in every business and at every DMV which contributes to this major chemical problems freely released into the air and our lungs in California.

I also believe that the Second Hand Smoke Laws are "not" strict enough. These are only being enforced in certain places. I have still seen people smoke too close to store entrances, baseball game bleachers, and many other places too close for comfort for our childeren and non-smokers. This is also a huge contribute to people with asthma. We need Laws that apply to everyone public or private property.

Sure their will be some unhappy people but their will also be less ill childeren and premature deaths. Less diseases that keep our childeren/loved ones from living healthy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 06:46:44

No Duplicates.

**Comment 162 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sue  
Last Name: Hurley  
Email Address: sue\_hurley@hotmail.com  
Affiliation:

Subject: Global Warming  
Comment:

California desperately needs a strong plan of action to slow down/stop global warming and achieve immediate reductions in smog and other dangerous air pollutants. The state of California is facing a public health crisis. I urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California.

For example, instead of eliminating many of the public bus routes in the East Bay, the plan should be to increase the number of buses on each route, and the number of bus routes. With the current price of gasoline, this will help both the air quality and the consumers (instead of paying for gas they can purchase food, ect.)

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 07:47:55

No Duplicates.

## **Comment 163 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Patricia  
Last Name: Waters  
Email Address: waters@sonic.net  
Affiliation:

Subject: CARB's draft implementation of AB32  
Comment:

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,

Patricia Waters

Attachment:

Original File Name:

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

No Duplicates.

**Comment 164 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joel  
Last Name: Ervice  
Email Address: joel@rampasthma.org  
Affiliation:

Subject: Comment on AB 32  
Comment:

see attached

Attachment: [www.arb.ca.gov/lists/sp-general-ws/374-carb\\_ab\\_32\\_letter.doc](http://www.arb.ca.gov/lists/sp-general-ws/374-carb_ab_32_letter.doc)

Original File Name: CARB AB 32 Letter.doc

Date and Time Comment Was Submitted: 2008-08-01 09:19:45

No Duplicates.

## **Comment 165 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

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

Subject: City of Oakland comments on Draft Scoping Plan  
Comment:

Please find attached comments from the City of Oakland on the Draft Scoping Plan.

The City of Oakland commends the California Air Resources Board (ARB) on a job well done in developing the Climate Change Draft Scoping Plan. The State is demonstrating tremendous leadership on this important topic and we appreciate the efforts of all those at ARB and elsewhere who have led and participated in the development of the Plan to date. The City of Oakland looks forward to collaborating with your agency and others in our ongoing efforts to reduce greenhouse gas emissions and improve quality of life for the residents of Oakland and all Californians.

In general, we are pleased with the commitment and progress ARB has made in advancing this Plan and other processes to help all of us achieve the goals articulated in AB 32. The Plan as a whole seems to be generally on target at this stage. Attached are several suggestions for further improving it. We look forward to future opportunities to provide additional comments and engage in dialogue around specific components as the process continues to unfold.

Garrett Fitzgerald  
Sustainability Coordinator  
City of Oakland

Attachment: [www.arb.ca.gov/lists/sp-general-ws/375-comments\\_to\\_arb\\_on\\_climate\\_draft\\_scoping\\_plan\\_073108.pdf](http://www.arb.ca.gov/lists/sp-general-ws/375-comments_to_arb_on_climate_draft_scoping_plan_073108.pdf)

Original File Name: Comments to ARB on Climate Draft Scoping Plan 073108.pdf

Date and Time Comment Was Submitted: 2008-08-01 09:27:35

No Duplicates.

## **Comment 166 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Karen  
Last Name: Phillips  
Email Address: vedagal23@yahoo.com  
Affiliation:

Subject: AB 32 - Sustainable Food Systems  
Comment:

August 1, 2008

Mary Nichols  
California Air Resources Board  
1001 "I" Street  
PO Box 2817  
Sacramento, Ca 95812

RE: AB 32 Scoping Plan: Sustainable and local food systems reduce carbon emissions

Dear Chairperson Nichols and Members of the California Air Resources Board,

I am writing on behalf of myself and all people who are interested in a wholesome and sustainable food supply to urge you to take a more comprehensive and effective approach to addressing the role of sustainable agriculture and local food systems in the state's strategy to reduce greenhouse gas emissions.

We call on the Air Resources Board, the California Department of Food and Agriculture, and city and county governments to adopt a wide range of policy, regulatory, research and funding measures that support:

- Organic, water-and-energy-efficient sustainable farming practices;
- Local food production, distribution and consumption, especially to meet the needs of under served low-income communities; and
- On farm production of wind and solar energy.

These practices will reduce greenhouse gas emissions and provide many additional benefits, including increased tax revenue for cities and counties, better air and water quality, improved farm worker and public health, reduced medical costs, and the creation of local green collar jobs. Further, one recent paper concluded that "Organic, sustainable agriculture that localizes food systems has the potential to mitigate nearly thirty percent of global greenhouse gas emissions and save one-sixth of global energy use."

We understand that there are a range of regulatory and market based options available to the State Government to curb greenhouse gas emissions. Given their lack of effectiveness in other regions, we do not support Cap and Trade and Cap and Auction-based

approaches. We are supportive of approaches that:

- Effectively, rapidly and efficiently reduces carbon emissions in the timeframe outlined by law;
- Do not increase the emissions of other health harming pollutants;
- Have strong enforcement mechanisms, including criminal and civil consequences for entities that violate regulations, as well as large emitters of carbon pollution
- Ensure we transition completely away from a fossil-fuel based economy that disproportionately harms low-income communities and communities of color to one that is efficient and run on sustainable energy technologies;
- Are democratic, meaning that Californians have a say in all major efforts to reduce carbon emissions;
- Support early and current adopters of low-carbon practices, such as today's organic farmer and cities and counties enacting carbon action plans, and
- Do not give away free or drastically cost-reduced polluting rights to big polluters.

We look forward to an implementation of the California Global Warming Solutions Act that supports a low-carbon, sustainable and just food system with meaningful, effective and democratic regulatory approaches.

Thank you for your serious consideration of these very important matters.

Yours Sincerely,  
Karen Phillips, R.N., P.H.N.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 09:46:22

No Duplicates.

**Comment 167 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Edward  
Last Name: Thompson  
Email Address: ethompson@farmland.org  
Affiliation: American Farmland Trust

Subject: Agriculture, Land Use & Climate Change  
Comment:

AFT urges CARB to set a more ambitious goal for GHG reduction from more efficient land use and transportation patterns, and to fully explore the potential of both carbon sequestration on agricultural land and encouraging locally-grown food to reduce "food miles traveled."

Attachment: [www.arb.ca.gov/lists/sp-general-ws/377-climate\\_change\\_-\\_comments\\_to\\_carb\\_on\\_scoping\\_plan\\_7-31-08.doc](http://www.arb.ca.gov/lists/sp-general-ws/377-climate_change_-_comments_to_carb_on_scoping_plan_7-31-08.doc)

Original File Name: Climate Change - Comments to CARB on Scoping Plan 7-31-08.doc

Date and Time Comment Was Submitted: 2008-08-01 09:55:37

No Duplicates.

## **Comment 168 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

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

Subject: Health, Environmental, Science Groups Emphasize Health Protection  
Comment:

July 31, 2008

Mary Nichols, Chairperson  
California Air Resources Board  
1001 I St. P.O. Box 2815  
Sacramento, CA 95812

Re: AB 32 Scoping Plan and Community Impacts Measures

Dear Chairperson Nichols:

On May 30, several environmental and health groups submitted a letter to you regarding the urgent need for the Air Resources Board to conduct public health and local impacts assessments on the mix of policies being considered by staff for the scoping plan.

We are pleased that the draft scoping plan commits to analyze all of the measures in the plan for impacts they will have on air pollution and public health (ES-2, 4, p.10). We look forward to seeing the results of those analyses and any subsequent revisions made to the plan based on the results.

Before the scoping plan is finalized, we encourage CARB to do the following:

- Assess, as accurately as possible, the co-pollutant increases or decreases associated with the five scenarios that have thus far been the subject of economic modeling. Based on these assessments, estimate the statewide and, to the extent feasible, local health impacts that may occur as a result for each of the five scenarios. We concur with the EJ Advisory Committee recommendation that outside health experts should be consulted to assist with the assessment of health impacts.
- Determine, as accurately as possible, the co-pollutants changes and resulting health impacts associated with each policy under consideration for the scoping plan (as would be required for determining cost-effectiveness). Use this information to determine how impacts would differ amongst mixes of policy choices.
- State in the Scoping Plan how CARB plans to accomplish the more detailed screenings that are required for each proposed regulation and market mechanism before it is implemented. (These screenings

are spelled out in Health and Safety Code 38562 (b) (1-9) and 38570 (b) (1-3) and include not disproportionately impacting low-income communities, not interfering with achieving air quality standards, maximizing total benefits to California, etc. ).

- State in the Scoping Plan that analytical tools and data sets needed will be updated periodically in consultation with outside experts and the EJ Advisory Committee.
- Clearly state in the scoping plan that no regulation or market mechanism included in the scoping plan will be implemented unless it has undergone the aforementioned screenings and meets the requirements established in 38562 (b) (1-9) and 38570 (b) (1-3).

#### Cumulative Impacts Screenings

CARB should conduct a cumulative impacts assessment to identify geographic areas that currently bear a higher pollution burden using the best available data and tools, including the Cumulative Impacts Screening Tool being developed by a team of university researchers in conjunction with CARB. This will give CARB a snapshot of communities that will need to be protected from potential increases in pollution due to future implementation of climate policies. Such a screening is only a first step in the design of state climate policies. CARB should use currently available information to identify communities with a higher pollution burden prior to the completion of the scoping plan.

Additional cumulative impacts screenings for the areas identified in an initial screening as disproportionately burdened communities--using a new tool or an adaptation of an existing tool that can extrapolate the future impacts of a proposed policy or set of policies-- will need to be conducted before any regulations are implemented. These screenings should inform decisions about which climate policies are implemented and how such policies are designed to assure that already-burdened communities will not be impacted by increases in pollution.

We thank you for all of your hard work and your willingness to work with stakeholders through this complex process of developing a world-class scoping plan that can become a model for the nation and the world.

Sincerely,

American Lung Association  
California Wind Energy Association  
Center for Biological Diversity  
Coalition for Clean Air  
Environment California  
Environmental Defense Fund  
Natural Resources Defense Council  
Planning and Conservation League  
Sierra Club  
Union of Concerned Scientists

Original File Name: Health Impacts-Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 10:54:32

No Duplicates.

## **Comment 169 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: David

Last Name: Rubenstein

Email Address: drubenstein@CaliforniaEthanolPower.com

Affiliation: California Ethanol & Power, LLC

Subject: California Ethanol & Power-Comments to Draft AB 32 Scoping Plan

Comment:

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

Re: Comments on the Draft AB 32 Scoping Plan

Dear Ms. Nichols and members and staff of the California Air Resources Board,

California Ethanol & Power, LLC (CE&P) is a company that was formed to produce energy in the Imperial Valley from locally-grown sugarcane. Our plan is to use "off the shelf" ethanol technology, which has been thoroughly proven in Brazil, to convert sugarcane grown on about 36,000 acres of surrounding farmland in Imperial County into approximately 60 million gallons of fuel-grade ethanol. The facility is also scheduled to combust bagasse (the shredded sugarcane stalks left over once the juice has been extracted) and field waste to potentially produce up to 50 megawatts of renewable electricity.

Our CE&P sugarcane ethanol is designed to be among the lowest carbon fuels in California. Sugarcane derived ethanol is already one of the lowest carbon fuels produced; it has a documented 80% GHG emission reduction when compared to the life-cycle of regular gasoline. The CE&P sugarcane to ethanol process, however, is a multi-faceted project and involves additional "closed-loop" strategies and technologies that might further reduce the carbon footprint of our fuel.

The purpose of this comment letter is to outline those strategies and technologies within the recommended measures found in the Draft AB 32 Scoping Plan and to request further clarification on scoping issues that will not only be beneficial to CE&P, but to the State of California as it strives to meet its GHG goals.

Renewable Portfolio Standard

Not only will CE&P produce enough power for its own facility needs but it also has the opportunity to produce up to 50 Mw of excess power that will assist utilities in meeting the aggressive RPS goal of 33 percent by 2020. CE&P would urge the California Air Resources Board (ARB) to encourage the California Energy Commission (CEC) and the California Public Utilities Commission (CPUC) to streamline the approval of projects like this that have the ability to generate excess renewable power as well as meet the

local air district standards for non-attainment.

#### Low Carbon Fuel Standard

The fuel cycle impacts (including multi-media impacts) of sugarcane to ethanol have been well documented and reported. Additionally, CE&P's initial operation will incorporate the latest agri-cultural techniques, currently being transitioned to in Brazil, which further enhance the fuel's low carbon footprint. CE&P would like to have the opportunity to provide ARB additional analysis on certain carbon reducing activities that are specific to our proposed facility.

Important to CE&P's overall life cycle impact is the consideration of the carbon that is emitted during the fermentation process. CE&P carbon dioxide is released during the processing of locally grown crops. This is different from the carbon dioxide produced from corn to ethanol facilities, where crops are railed in from out of state. CE&P, therefore, would like to propose to ARB that the carbon dioxide emissions from the fermentation process are carbon neutral because it is part of the short-term CO<sub>2</sub> cycle of the biosphere.

In an effort, however, to reduce those carbon emissions, CE&P is evaluating the capture of this carbon dioxide for industrial refrigeration and other types of innovative uses. For example, there is developing technology that allows CO<sub>2</sub> emissions to be absorbed through algae plantations. CE&P will continue to assess this technology and others and would also look toward ARB in assisting industry in evaluating those technologies for carbon sequestration.

#### Water

CE&P will undertake measures to increase water use efficiency and re-use within our plant design. CE&P is committed to water recycling and will be interested in the participation of estimating and documenting the GHG reduction from water efficiency efforts.

#### Recycling and Waste

As with water, CE&P is committed to the recycling of its organic by-products. The prospect exists for CE&P to generate and capture methane emissions. ARB should assess and state the opportunity to scope the reduction of methane emissions from other types of industrial activities as well. CE&P would be interested in exploring with ARB programs and initiatives that promote more innovative uses for captured methane; such as pipeline quality natural gas, compressed natural gas for fuel, and fuel cell technology.

CE&P is also planning on utilizing the by-products of the sugarcane process to produce various types of organic fertilizers. These organic fertilizers will be applied to our sugarcane fields and will offset the carbon emissions from petrochemical derived fertilizers (i.e. nitrogen) that are usually used. CE&P proposes to include this offset as part of the life cycle impact of our fuel and asks that ARB further scope the CO<sub>2</sub> offsets of replacing chemical fertilizers with recycled organic fertilizers.

#### Agriculture

Sugarcane is a perennial crop and is one of the highest carbon absorbing crops grown in California. CE&P wishes to work with ARB in developing sound quantification protocols on the carbon

sequestration of sugarcane. As stated above, the sugarcane and its residual biomass will be com-busted within emission limits for onsite power and for renewable power to the electric grid. Excess biomass will be utilized either as a fuel at another planned power production facility or as cattle feed to support the existing markets. Since the power will be produced through the com-bustion of locally grown biomass, we request that ARB confirm through their scoping that the combustion of this biomass is carbon neutral. By combusting the locally grown sugarcane derived biomass, CE&P is able to offer more of a "closed-loop" process that promotes the return of the energy value of the crop back to the area it is grown. Special consideration should be given to agricultural projects similar to CE&P which capture and advance this process.

CE&P is thankful for the opportunity to comment on the Draft AB 32 Scoping Plan in relation to our proposed project. We believe our project is consistent with the ambitious reductions laid out in AB 32 and we are excited about the opportunities our project will bring to Imperial Valley and the State of California. We look forward to working with ARB as we develop our project and we hope that through the AB 32 process we can demonstrate that production of energy from sugarcane is "growing energy the right way".

Please feel free to contact me at 310/545-8887 or drubenstein@CaliforniaEthanolPower.com if you have any questions or concerns regarding our project.

Respectfully submitted,

David R. Rubenstein  
Chief Operating Officer  
California Ethanol & Power, LLC

sugarcane: growing energy the right way

Attachment: [www.arb.ca.gov/lists/sp-general-ws/381-cep\\_comments-ab32scoping.pdf](http://www.arb.ca.gov/lists/sp-general-ws/381-cep_comments-ab32scoping.pdf)

Original File Name: CEP Comments-AB32Scoping.pdf

Date and Time Comment Was Submitted: 2008-08-01 11:24:03

No Duplicates.

**Comment 170 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gregg

Last Name: Morris

Email Address: gmorris@emf.net

Affiliation: Green Power Institute

Subject: Comments on the Draft Scoping Plan

Comment:

I am sending two files, but I do not know how to combine them.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/382-gpi\\_comments\\_on\\_draft\\_scoping\\_plan\\_8-1-8.pdf](http://www.arb.ca.gov/lists/sp-general-ws/382-gpi_comments_on_draft_scoping_plan_8-1-8.pdf)

Original File Name: GPI comments on draft scoping plan 8-1-8.pdf

Date and Time Comment Was Submitted: 2008-08-01 11:39:18

No Duplicates.

**Comment 171 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gregg

Last Name: Morris

Email Address: gmorris@emf.net

Affiliation: Green Power Institute

Subject: Comments on the Draft Scoping Plan

Comment:

This report is being submitted for the record in conjunction with the Green Power Institute's Comments on the Draft Scoping Plan. It is referenced in our comments.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/383-white\\_paper\\_pac\\_inst.pdf](http://www.arb.ca.gov/lists/sp-general-ws/383-white_paper_pac_inst.pdf)

Original File Name: White Paper Pac Inst.pdf

Date and Time Comment Was Submitted: 2008-08-01 11:43:25

No Duplicates.

## **Comment 172 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Yvette

Last Name: Rincon

Email Address: yrincon@cityofsacramento.org

Affiliation: City of Sacramento

Subject: City of Sacramento - General Comments

Comment:

The City of Sacramento has the following general comments:

1. Additional time to review the Draft Plan would have/will have a positive impact on the quality and completeness of the final document. With additional time the City could more comprehensively solicit input from all appropriate staff members and commented on all aspects of the Draft Plan that we believe will impact the City.
2. Retaining local control over land use is a significant concern to the City of Sacramento.
3. Any final regulations should take in to account the significant costs of implementing a climate action plan. Over the past several years, the City of Sacramento has taken the initiative to register its greenhouse gas emission inventory with the California Climate Registry and bears the burden of funding the administrative costs for tracking and reporting our municipal greenhouse gas emissions. The cost for developing and implementing a climate action plan will be significant.
4. We strongly encourage ARB to adopt an incentive based model for cities to develop regional GHG reduction targets as opposed to a model of mandates and/or regulations.
5. Finally, cities across the State are different and have unique challenges and opportunities, therefore, we would strongly oppose a one size fits all approach to reducing greenhouse gas emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 11:52:20

No Duplicates.

**Comment 173 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Steve

Last Name: Burns

Email Address: [stephen.burns@chevron.com](mailto:stephen.burns@chevron.com)

Affiliation: Chevron Corporation

Subject: Draft Scoping Plan

Comment:

Please find attached our general comments - draft scoping plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/385-cvx\\_scoping\\_plan\\_comments\\_final2.pdf](http://www.arb.ca.gov/lists/sp-general-ws/385-cvx_scoping_plan_comments_final2.pdf)

Original File Name: CVX\_Scoping\_Plan\_Comments final2.pdf

Date and Time Comment Was Submitted: 2008-08-01 11:54:55

No Duplicates.

## **Comment 174 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Sue  
Last Name: Lynn  
Email Address: suelynn403@yahoo.com  
Affiliation: Sierra Club

Subject: CARB's Draft Scoping Plan  
Comment:

There are a number of strong suggestions in the draft, including the call for renewable energy by 2020. But more needs to be done. It's important to make polluters pay for their emissions, and the funds generated can be used to promote clean energy and help low-income consumers make needed changes. Offsets should be used sparingly, and should be fully verified.

Land use planning needs to include stronger measures designed to reduce vehicle miles travelled, by making housing and commercial activities denser.

Allow communities to pool their buying power in order to develop clean power through Community choice Electricity Aggregation.

It's critical that auto companies be required to sell far more zero-emission vehicles than the current draft requires; 7500 ZEVs is a drop in the bucket. Hundreds of thousands are needed.

Stronger measures are needed in the area of waste and recycling. Electronics companies should be required to dispose of their products when they are no longer working, as should other manufacturers. This would encourage production of more durable goods. businesses and building facilities should be required to increase recycling, and compost green waste where there is sufficient quantity.

I am a Sierra Club member and to me global warming is the single biggest issue facing our world today. If we don't get this right, we're toast. I'm proud to be a Californian, since California is taking the lead on this issue. The scoping plan needs to be strengthened to provide the strongest possible efforts to counter global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 11:57:05

No Duplicates.

**Comment 175 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Yvette

Last Name: Rincon

Email Address: yrincon@cityofsacramento.org

Affiliation: City of Sacramento

Subject: City of Sacramento Comments

Comment:

Attached is the City's comments.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/387-city\\_of\\_sac\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/387-city_of_sac_comments.pdf)

Original File Name: City of Sac Comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 12:06:33

No Duplicates.

**Comment 176 for General Comments for the GHG Scoping Plan (sp-general-  
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:

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 Resource Solutions

Attachment: [www.arb.ca.gov/lists/sp-general-ws/388-crs\\_arb\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/388-crs_arb_scoping_plan_comments.pdf)

Original File Name: CRS ARB Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 12:19:57

No Duplicates.

**Comment 177 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Carol  
Last Name: Misseldine  
Email Address: cmisseldine@mindspring.com  
Affiliation: Green Cities California

Subject: General Comments on the AB 32 Draft Scoping Plan  
Comment:

Green Cities California's (GCC) general comments on the AB 32 Draft Scoping Plan are being submitted in the attached Word document.

Thank you,

Carol Misseldine, Coordinator  
Green Cities California  
415/388-5273  
cmisseldine@comcast.net

Attachment: [www.arb.ca.gov/lists/sp-general-ws/389-green\\_cities\\_california\\_general\\_comments.ab\\_32\\_draft\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/sp-general-ws/389-green_cities_california_general_comments.ab_32_draft_scoping_plan.doc)

Original File Name: Green Cities California GENERAL comments.AB 32 Draft Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-08-01 12:22:59

No Duplicates.

**Comment 178 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kathy

Last Name: Seal

Email Address: kathyseal@gmail.com

Affiliation:

Subject: Thanks and please beef it up!

Comment:

Thank you for calling for 1/3 of our electricity to be generated by clean energy by 2020. I'd like you also to consider adding to the Scoping Plan the following points: please auction off any GHG emission credits and use the proceeds to promote clean energy and to help low-income folks. Please allow only very limited and verifiable offsets, and please don't link our program to any states with weaker emission standards. I would also like you to promote CCA, call on auto companies to make hundreds of thousands of ZEVs, and to implement Zero Waste Policies such as recycling by businesses, building green waste to compost facilities, and making producers take responsibility for the end-of-life disposition of their products. Finally, please include stronger measures to reform land use planning to reduce vehicle miles traveled in California.

Thanks very much for all your hard work on this scoping plan,

Kathy Seal

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 12:25:04

No Duplicates.

## **Comment 179 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

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

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 proved 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 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, eutrophication 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](http://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 Crisis. Otherwise, by 2012, the world is going to the point of no return. Human species 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 12:30:59

No Duplicates.

**Comment 180 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 181 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mike

Last Name: Rojas

Email Address: mrojas@mwdh2o.com

Affiliation: MWD of Southern California

Subject: Metropolitan Water District of Southern California CARB AB 32 Scoping Plan  
Comments

Comment:

The Metropolitan Water District of Southern California is pleased to provide comments in response to the DRAFT AB 32 Scoping Plan prepared by the California Air Resources Board. The comment letter is attached in .pdf format.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/393-08\\_01\\_08\\_mwd\\_commentltr\\_ab\\_32\\_drftscopingplan\\_final\\_\\_with\\_sig\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/393-08_01_08_mwd_commentltr_ab_32_drftscopingplan_final__with_sig_.pdf)

Original File Name: 08\_01\_08 MWD CommentLtr\_AB 32 DrftScopingPlan\_final (with sig).pdf

Date and Time Comment Was Submitted: 2008-08-01 12:40:38

No Duplicates.

## **Comment 182 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Sandy

Last Name: Sanders

Email Address: sandy\_sanders@earthlink.net

Affiliation:

Subject: General Comments on CA Climate Change Plan

Comment:

It is excellent that the public can comment on the Scoping Plan but I have some concerns.

Comments are broken up into a dozen components and when included with absorbing the documentation and obtaining outside information to respond appropriately, this would literally take citizens many hours of valuable time.

With all the problems our society has, is it reasonable to think that citizens will be able to make comments to each of these circumstances that government agencies are attempting solve problems?

I think that citizen participation has been made too complex by business lobbies thwarting our government from legislating sustainability. Businesses and corporations thusly have shaped our civilization into near failure mode.

Solving environmental problems is only complex when business lobbying makes it so. This is not brain surgery. Eliminating toxicity and building sustainability should be an unwavering objective of 2020 with incremental steps negotiated with businesses to make it reality. This would give them 12 years. If they do not participate, fine them and send them packing, and start government/citizen-run businesses to build clean, sustainable technologies by hiring their employees and brainstorming us to useful solutions.

Here's a list of ideas to be implemented by 2020:

- Solar Rooftops and Wind or other clean alternative energy subsidies and mandates for existing and new buildings to equal CA energy needs by 2020.
- Phase-out of all gasoline or deisel automobiles by 2020 from new car sales.
- Repeal all local laws resricting the growth and planting of food and fruit bearing plants and trees so that local food production can be done by citizens themselves.
- Make public transporation free and drastically ramp up new, clean, efficient public transportation as resulting demand will require.

- Lower the 40 hour workweek to 24 hours, allowing more jobs and more free time to citizens so they can participate in local self sustainance and direct democracy.

- Eliminate Corporate Personhood to remove wealthy, non-citizen influences from our democracy!

This is not brain surgery. The only blockage to these above initiatives are the whining of existing businesses who depend upon controlling our government from allowing common sense sustainable change, so they don't have to invest and retool to sustainability. They are just lazy and need to kicked in the butt, or booted!

Sandy Sanders  
2200 Adeline Street, #250A  
Oakland, CA 94607  
H: 510/763-1935  
Sandy\_Sanders@earthlink.net  
www.BlueJayWay.net

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 12:43:17

No Duplicates.

**Comment 183 for General Comments for the GHG Scoping Plan (sp-general-  
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:

Please see attached comment letter and attachment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/395-se\\_draft\\_scoping\\_plan\\_comments\\_lrtm\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/395-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 12:46:31

No Duplicates.

## **Comment 184 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jenny  
Last Name: Huston  
Email Address: [jhuston@bayareacs.org](mailto:jhuston@bayareacs.org)  
Affiliation: BACS

Subject: AB 32 Scoping Plan: Sustainable and local food systems reduce carbon emissions  
Comment:

RE: AB 32 Scoping Plan: Sustainable and local food systems reduce carbon emissions

Dear Chairperson Nichols and Members of the California Air Resources Board,

I am writing on behalf of BACS to urge you to take a more comprehensive and effective approach to addressing the role of sustainable agriculture and local food systems in the state's strategy to reduce greenhouse gas emissions.

We call on the Air Resources Board, the California Department of Food and Agriculture, and city and county governments to adopt a wide range of policy, regulatory, research and funding measures that support:

- Organic, water-and-energy-efficient sustainable farming practices;
- Local food production, distribution and consumption, especially to meet the needs of under served low-income communities; and
- On farm production of wind and solar energy.

These practices will reduce greenhouse gas emissions and provide many additional benefits, including increased tax revenue for cities and counties, better air and water quality, improved farm worker and public health, reduced medical costs, and the creation of local green collar jobs. Further, one recent paper concluded that "Organic, sustainable agriculture that localizes food systems has the potential to mitigate nearly thirty percent of global greenhouse gas emissions and save one-sixth of global energy use."

We understand that there are a range of regulatory and market based options available to the State Government to curb greenhouse gas emissions. Given their lack of effectiveness in other regions, we do not support Cap and Trade and Cap and Auction-based approaches. We are supportive of approaches that:

- Effectively, rapidly and efficiently reduces carbon emissions in the timeframe outlined by law;
- Do not increase the emissions of other health harming

pollutants;

- Have strong enforcement mechanisms, including criminal and civil consequences for entities that violate regulations, as well as large emitters of carbon pollution
- Ensure we transition completely away from a fossil-fuel based economy that disproportionately harms low-income communities and communities of color to one that is efficient and run on sustainable energy technologies;
- Are democratic, meaning that Californians have a say in all major efforts to reduce carbon emissions;
- Support early and current adopters of low-carbon practices, such as today's organic farmer and cities and counties enacting carbon action plans, and
- Do not give away free or drastically cost-reduced polluting rights to big polluters.

We look forward to an implementation of the California Global Warming Solutions Act that supports a low-carbon, sustainable and just food system with meaningful, effective and democratic regulatory approaches.

Yours Sincerely,

J. Huston, MA, CEC, CDM, CFPP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 13:08:56

No Duplicates.

## **Comment 185 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Leslie

Last Name: Purcell

Email Address: lapurcell@verizon.net

Affiliation:

Subject: comments for AB 32 implementation

Comment:

1. Mandate City, County, and State buildings and facilities to immediately begin design and implementation of solar roofing and solar water-heaters, and other green building practices for new and retrofit.
2. Mandate and give incentives and rebates for business-owners to do the same.
4. ...Likewise for property-owners, and tenants. (Japan has a solar water-heater program that we could implement here).
5. Energy companies should pay for the energy people put back into the grid generated from solar-roofs.
6. Policy should require developers (including governmental entities) to mitigate for heat and run-off producing pavement and buildings by providing equivalent green space, trees, gardens, etc.
7. Government policy should encourage and facilitate community gardens where local people can grow fruits and vegetables, cutting down on need for long distance transport of produce.
8. Mandate clean diesel, bio-diesel, or alternatives for ships and trucks.
9. Institute a reduction in ship speeds along the coast, to 10 knots, through Santa Barbara Channel to the ports of Los Angeles, and in the northern CA shipping lanes and approaches to San Francisco and Oakland. (fuel-efficient, less-polluting).
10. Unchannelize creeks and rivers, so that they can perform their natural functions, with more cooling and vegetation as a result.
11. Plant more native plants and trees, better suited to the environment, requiring less water and chemicals.
12. Encourage bio-diversity.
13. Cable cars, light rail, alternative sources of transport.
14. More electric and alternative vehicles in government fleets and rebates for consumers to buy them. Tax credits for innovation in design, research into alternative fuel sources and vehicles.

15. Local community cooperatives for buying clean power.

16. Wind-power: incentives for different levels of projects, from individual to larger corporate, government, or public projects.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 13:27:30

No Duplicates.

**Comment 186 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sonja

Last Name: Brodt

Email Address: sbbrodt@ucdavis.edu

Affiliation: UC Davis Agric. Sustainability Inst.

Subject: Additional ways to address climate change in the food system

Comment:

Please refer to attached letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/399-asi\\_scoping\\_plan\\_response\\_letter\\_8-1\\_with\\_white\\_paper.pdf](http://www.arb.ca.gov/lists/sp-general-ws/399-asi_scoping_plan_response_letter_8-1_with_white_paper.pdf)

Original File Name: ASI Scoping Plan Response Letter 8-1 with white paper.pdf

Date and Time Comment Was Submitted: 2008-08-01 13:36:34

No Duplicates.

## **Comment 187 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Shannon

Last Name: Parry

Email Address: shannon.parry@smgov.net

Affiliation: City of Santa Monica

Subject: AB 32 Scoping Plan

Comment:

1. **Set More Aggressive Targets:** The goals and regional targets recommended in the Draft Scoping Plan are far too low to achieve necessary reductions in greenhouse gas emissions.
2. **Make Municipal Participation Mandatory:** The local government section emphasizes that municipal governments are essential to achieving California's greenhouse gas goals, but participation in AB 32 remains voluntary. Voluntary participation ensures that only those municipalities already committed to greenhouse gas reductions participate. Those municipalities that currently operate under business as usual assumptions will continue to do so. Municipal governments have operational and financial control over significant sources of greenhouse gas emissions. Given the proper requirements, we can create projects, programs, and policies that reduce greenhouse gas emissions.
3. **Use the Model of AB 939:** Mandate the development, adoption and implementation of local climate action plans. Municipalities need the authority and accountability of a State mandate in order to meet their greenhouse gas reduction targets. Local governments should be required to develop, adopt and implement climate action plans that are consistent with their General Plan and integrated in CEQA documents.
4. **Provide Funding:** The cost of compliance with AB32 reporting requirements can be burdensome for municipal governments, especially if participation in AB 32 is voluntary. A funding mechanism should be created to allow limited municipal funds to be directed at projects, programs and policies that reduce greenhouse gas emissions. We strongly support the need for standardization and third party verification of greenhouse gas emissions, but are concerned that the cost of voluntary compliance will prohibit the creation of mechanism that actually reduce emissions.
5. **Expand the Scope:** The scoping plan should address municipal and community energy, waste and recycling, water and wastewater systems, and land use and urban design.
6. **Align Past and Current Reporting Protocols:** The City of Santa Monica has performed greenhouse gas emissions inventories starting in 1990. Many leading municipal governments have done the same. In order to utilize this data in a meaningful way, we suggest the creation of a standard coefficient to translate historical greenhouse gas emissions data to be consistent with the current model assumptions.

7. Access to Reporting Data: The State should work with utilities and public agencies to ensure that the data required for greenhouse gas emissions inventories is available. Currently, there are fees associated with procuring this data as well as a 1 - 3 month waiting list.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 13:39:11

No Duplicates.

**Comment 188 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Timothy  
Last Name: Burroughs  
Email Address: tburroughs@ci.berkeley.ca.us  
Affiliation: City of Berkeley

Subject: City of Berkeley Comments  
Comment:

The City of Berkeley is pleased to provide comments on the Draft Scoping Plan. Please find the comments attached in .pdf format.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/401-berkeley\\_letter.pdf](http://www.arb.ca.gov/lists/sp-general-ws/401-berkeley_letter.pdf)

Original File Name: Berkeley\_Letter.pdf

Date and Time Comment Was Submitted: 2008-08-01 13:44:16

No Duplicates.

## **Comment 189 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Chris

Last Name: Rall

Email Address: chris.rall@green-wheels.org

Affiliation: Green Wheels

Subject: Do more to reduce VMT through land use and transportation

Comment:

Green Wheels is an organization which advocates for balanced and sustainable transportation on in Humboldt County.

The related issues of transportation and land use present a unique opportunity to address climate emissions. By investing in smart transportation and land use policy that reduces vehicle miles traveled, not only can we substantially reduce greenhouse gas emissions, but we can also create ancillary benefits to the economy, public health, public safety, community cohesion and quality of life. Since transportation accounts for around half of California's greenhouse gas emissions, we can hardly afford to short-change such strategies as the draft AB32 Scoping Plan does.

Reducing VMT helps the economy by reducing the need to import ever-more-expensive oil, and cars to our region. When people walk bike and walk to the transit stop more, they get their daily dose of physical activity, something badly needed in the era of a type II diabetes epidemic. With fewer cars on the road, fewer people are injured and killed in auto-collisions, the number one cause of death for Californians between the ages of 1 and 35. And with safer streets and more people outside getting active, we can interact with our neighbors more, and have more fun. All of this while using one of the most cost-effective strategies for reducing emissions.

We recommend the following:

- Increase the proposed reduction target for land use and transportation from 2 million metric tons (MMT) to about 10 MMT.

- Put in place 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, set firm targets for regions and authorize regions and localities to choose from a suite of policy tools to achieve the targets.

- 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.

- Prioritize investment in public transportation and programs to improve transportation efficiency and reduce congestion.

- Give entities like our county, which is currently updating its general plan, 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. This will also help us keep our growth compact, facilitating more efficient transportation.

We can tackle our contribution to climate disruption, but we need to do it in a smart way. Transportation and land use's share of emissions, along with the ancillary benefits of being aggressive in this sector, make this a smart thing to do.

Chris Rall  
Green Wheels " Executive Director

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 13:47:41

No Duplicates.

**Comment 190 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

Subject: NAIMA's Comments - AB 32 Draft Scoping Plan  
Comment:

August 1, 2008

Attached please find NAIMA's comments on the California Air Resources Board's "Climate Change Draft Scoping Plan" (AB 32 Draft Scoping Plan).

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

Attachment: [www.arb.ca.gov/lists/sp-general-ws/403-naimacommentsab32draftscopingplan080108.doc](http://www.arb.ca.gov/lists/sp-general-ws/403-naimacommentsab32draftscopingplan080108.doc)

Original File Name: NAIMACommentsAB32DraftScopingPlan080108.doc

Date and Time Comment Was Submitted: 2008-08-01 13:51:33

No Duplicates.

**Comment 191 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 192 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Melissa

Last Name: Dorn

Email Address: mdorn@mwe.com

Affiliation:

Subject: Comments of Morgan Stanley Capital Group Inc.

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/405-comments\\_of\\_morgan\\_stanley.pdf](http://www.arb.ca.gov/lists/sp-general-ws/405-comments_of_morgan_stanley.pdf)

Original File Name: Comments of Morgan Stanley.pdf

Date and Time Comment Was Submitted: 2008-08-01 14:05:26

No Duplicates.

**Comment 193 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Stettner

Email Address: jen.c.stettner@conocophillips.com

Affiliation: ConocoPhillips

Subject: ConocoPhillips Comments CA Draft Scoping Plan

Comment:

ConocoPhillips is committed to playing a proactive and positive role in the development of efficient, equitable and environmentally effective climate change policy. Attached you will find our comments on California's Climate Change Draft Scoping Plan as well as our position on climate change.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/406-conocophillips\\_comments\\_-\\_ca\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/406-conocophillips_comments_-_ca_draft_scoping_plan.pdf)

Original File Name: ConocoPhillips Comments - CA Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 14:10:10

No Duplicates.

**Comment 194 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Betsy

Last Name: Reifsnider

Email Address: betsyreif@comcast.net

Affiliation: Catholic Charities, Diocese of Stockton

Subject: general comments on AB 32 draft scoping plan

Comment:

Catholic Charities, Diocese of Stockton attaches our two-page  
letter of comments.

Thank you for this opportunity.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/407-  
stk\\_diocese\\_ab\\_32\\_scoping\\_comments.doc](http://www.arb.ca.gov/lists/sp-general-ws/407-stk_diocese_ab_32_scoping_comments.doc)

Original File Name: Stk Diocese AB 32 Scoping comments.doc

Date and Time Comment Was Submitted: 2008-08-01 14:16:42

No Duplicates.

**Comment 195 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michael B.

Last Name: Day

Email Address: mday@goodinmacbride.com

Affiliation: Goodin, MacBride, Squeri, Day & Lamprey

Subject: Comments of Current Group, LLC on Draft Scoping Plan

Comment:

To Whom It May Concern:

Please find attached to this email the Comments on Climate Draft Scoping Plan submitted today by Current Group, LLC to the California Air Resources Board.

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

Regards,

Linda L. Chaffee

Secretary for Michael B. Day

Attachment: [www.arb.ca.gov/lists/sp-general-ws/408-carb\\_comments\\_on\\_draft\\_scoping\\_plan.pdf\\_\\_x102007\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/408-carb_comments_on_draft_scoping_plan.pdf__x102007_.pdf)

Original File Name: carb comments on draft scoping plan.pdf (x102007).pdf

Date and Time Comment Was Submitted: 2008-08-01 14:22:41

No Duplicates.

## **Comment 196 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Peter  
Last Name: Cooper  
Email Address: pcooper@calaborfed.org  
Affiliation: California Labor Federation

Subject: State's global warming solutions should produce good jobs  
Comment:

This op-ed by Art and Ken Jacobs from the UC Berkeley Labor Center ran in today's SF Chronicle.

State's global warming solutions should produce good jobs

Art Pulaski, Ken Jacobs

<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2008/07/31/EDGH122UNM.DTL>

Friday, August 1, 2008

Today is the final day for public comments on the draft plan for implementing AB32, California's global warming solutions plan, and one area that has still received far less attention than it should is the key role California's workers must play in restructuring our economy to reduce our carbon footprint. Here are some ideas we should incorporate into the plan:

-- Invest in the California workforce. We need to make sure there is an adequate supply of workers trained in the new technologies of a greener economy. While some green jobs will be in new businesses and new occupations, most green economy jobs are actually variations of traditional occupations in the construction trades, utilities, manufacturing and transportation. Workers in those fields will require new training as employers adopt cleaner processes. Community colleges, union apprenticeship programs and other training programs will need expanding. It is also essential that we reinvigorate career technical education in California public schools for the next generation of workers who will build our green future.

-- Favor policies that are proven to create good, middle-class jobs. We applaud the strong emphasis on energy efficiency and renewable energy in the AB32 draft implementation plan. Both of these areas have been shown to create large numbers of jobs. However, there must be measures to ensure that these are high-quality jobs with family-supporting wages, benefits and career pathways.

-- Prevent jobs from leaving the state. If businesses leave California for other states or other countries with less stringent greenhouse-gas emissions restrictions - and then ship the products that are made elsewhere back to California - this will hurt California workers /and/ undermine the state's goal of reducing

greenhouse gas emissions. The California Air Resources Board can prevent this by implementing policies to ensure that out-of-state producers compete on the same playing field as in-state producers.

-- Help workers transition to a greener California economy. AB32 is likely to result in some job losses in specific heavy polluting industries, although overall employment is projected to grow. To support and provide retraining for displaced workers, the state should create a climate adjustment assistance program, modeled on the federal Trade Adjustment Assistance Program.

-- Invest in infrastructure and innovation. Whatever system is crafted to lower greenhouse-gas emissions, that system and revenues generated from it should be closely managed by the public for the public good. Revenues will be needed to help finance innovation and adoption of new technologies that can lead to permanent emissions reductions in California. This includes retooling industry, research and development of new technology, rebuilding California's manufacturing base, and upgrading our infrastructure. This would include investments in public transit, denser urban development and building retrofits. Additionally, because rising energy prices will hit low-income consumers the hardest, the state will need to fund programs to help them make them transition to more energy-efficient housing and transportation. AB32 can be a win for the environment and a win for working people. But the win-win is not going to be created by wishful thinking; it's going to be created by intentional policies like those above. The Air Resources Board has the opportunity to help shape this major restructuring of our economy in a way that promotes California businesses, creates good jobs for a skilled and stable workforce, and reduces our carbon footprint. Our planet and its people depend on it.

/Art Pulaski is the executive secretary-treasurer of the California Labor Federation, and Ken Jacobs is chairman of the UC Berkeley Center for Labor Research and Education./

<http://sfgate.com/cgi-bin/article.cgi?f=/c/a/2008/08/01/EDGH122UNM.DTL>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 14:30:03

No Duplicates.

**Comment 197 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Craig

Last Name: Jones

Email Address: [cjones@swc.org](mailto:cjones@swc.org)

Affiliation: State Water Contractors

Subject: Climate Change Draft Scoping Plan Comments

Comment:

Please see attached State Water Contractors comment letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/410-carb\\_draftscopingplan\\_swccommentletter\\_080108submitted.pdf](http://www.arb.ca.gov/lists/sp-general-ws/410-carb_draftscopingplan_swccommentletter_080108submitted.pdf)

Original File Name: CARB DraftScopingPlan SWCCCommentLetter 080108Submitted.pdf

Date and Time Comment Was Submitted: 2008-08-01 14:46:41

No Duplicates.

**Comment 198 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Monica

Last Name: Ta

Email Address: gfxdm@yahoo.com

Affiliation:

Subject: Go Veg. Be Green To Save The Planet

Comment:

It's very simple as 1,2,3... When every single person turns back to original state of vegetarian as 250 mil years ago, all resources will be stopped from damages immediately and be healed gradually.

For more detailed information, please visit:  
[www.suprememastertv.com](http://www.suprememastertv.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 14:51:35

No Duplicates.

**Comment 199 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Heather

Last Name: Fenney

Email Address: heather@cafoodjustice.org

Affiliation:

Subject: Sustainable and local food systems reduce carbon emissions

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/sp-general-ws/412-arb\\_scoping\\_plan\\_comments-final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/412-arb_scoping_plan_comments-final.pdf)

Original File Name: ARB Scoping Plan Comments-FINAL.pdf

Date and Time Comment Was Submitted: 2008-08-01 14:54:40

No Duplicates.

**Comment 200 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Stephanie

Last Name: Cheng

Email Address: scheng@ebmud.com

Affiliation: CA Wastewater Climate Change Group

Subject: Draft AB 32 Scoping Plan

Comment:

Comments on Draft AB 32 Scoping Plan, on behalf of the California  
Wastewater Climate Change Group are attached.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/413-1-aug-  
2008\\_cwccg\\_scoping\\_plan\\_comment\\_letter\\_\\_final\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/413-1-aug-2008_cwccg_scoping_plan_comment_letter__final_.pdf)

Original File Name: 1-Aug-2008 CWCCG Scoping Plan Comment Letter \_final\_.pdf

Date and Time Comment Was Submitted: 2008-08-01 15:08:10

No Duplicates.

## **Comment 201 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Elizabeth  
Last Name: Powell  
Email Address: epowell@plumasruralservices.org  
Affiliation:

Subject: food system comments  
Comment:

August 1, 2008

Mary Nichols  
California Air Resources Board  
1001 "I" Street  
PO Box 2817  
Sacramento, Ca 95812

RE: AB 32 Scoping Plan: Sustainable and local food systems reduce carbon emissions

Dear Chairperson Nichols and Members of the California Air Resources Board,

I am writing on behalf of Plumas Rural Services to urge you to take a more comprehensive and effective approach to addressing the role of sustainable agriculture and local food systems in the state's strategy to reduce greenhouse gas emissions.

We call on the Air Resources Board, the California Department of Food and Agriculture, and city and county governments to adopt a wide range of policy, regulatory, research and funding measures that support:

- Organic, water-and-energy-efficient sustainable farming practices;
- Local food production, distribution and consumption, especially to meet the needs of under served low-income communities; and
- On farm production of wind and solar energy.

These practices will reduce greenhouse gas emissions and provide many additional benefits, including increased tax revenue for cities and counties, better air and water quality, improved farm worker and public health, reduced medical costs, and the creation of local green collar jobs. Further, one recent paper concluded that "Organic, sustainable agriculture that localizes food systems has the potential to mitigate nearly thirty percent of global greenhouse gas emissions and save one-sixth of global energy use."

We understand that there are a range of regulatory and market based options available to the State Government to curb greenhouse gas emissions. Given their lack of effectiveness in other regions, we do not support Cap and Trade and Cap and Auction-based approaches. We are supportive of approaches that:

- Effectively, rapidly and efficiently reduces carbon emissions in the timeframe outlined by law;
- Do not increase the emissions of other health harming pollutants;
- Have strong enforcement mechanisms, including criminal and civil consequences for entities that violate regulations, as well as large emitters of carbon pollution
- Ensure we transition completely away from a fossil-fuel based economy that disproportionately harms low-income communities and communities of color to one that is efficient and run on sustainable energy technologies;
- Are democratic, meaning that Californians have a say in all major efforts to reduce carbon emissions;
- Support early and current adopters of low-carbon practices, such as today's organic farmer and cities and counties enacting carbon action plans, and
- Do not give away free or drastically cost-reduced polluting rights to big polluters.

We look forward to an implementation of the California Global Warming Solutions Act that supports a low-carbon, sustainable and just food system with meaningful, effective and democratic regulatory approaches.

Yours Sincerely,  
Elizabeth Powell

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 15:12:28

No Duplicates.

## **Comment 202 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Virginia  
Last Name: Nicols  
Email Address: vnicols@ecomotion.us  
Affiliation:

Subject: Comments on the CARB Climate Change Draft Scoping Plan  
Comment:

August 1, 2008

Dear CARB Officials:

Thanks so much for the opportunity to provide written comments to the Climate Change Scoping Plan Draft report. Speaking on behalf of the City of Santa Monica's Solar Santa Monica and its Advisory Board members in particular, we salute your efforts to date and offer the following comments in the spirit of enhancement.

The Santa Monica Context

Solar Santa Monica fully supports AB 32 and its successful implementation. Just as the State of California has set ambitious - seemingly impossible "stretch goals" for climate change mitigation -- the City of Santa Monica has also taken a leadership position:

- By 2015, Santa Monica intends to cut overall city GHG emissions to a level 15% below 1990 levels. By the same date, Santa Monica intends to cut City uses and GHG contributions by 20% below 1990 levels.
- Through the Community Energy Independence Program and Solar Santa Monica, the City intends to be a "net zero electricity importer" by 2020. This means that enough power will be conserved and locally generated to completely offset traditional sources.

Santa Monica realizes that State initiatives are essential. One thing is abundantly clear: Without effective state and national leadership, Santa Monica will be unable to reach its goals.

General Comments on the Scoping Plan

Mitigating emissions and stabilizing the climate is an enormous task. Again, we salute your efforts and stand ready and willing to support your works in the months and years to come.

The 169 MMTCO<sub>2</sub>E reduction target is daunting. We're pleased to see that energy efficiency and renewable energy technologies - mostly in the form of the RPS - play such a major role.

However, we are surprised that solar energy, particularly photovoltaic electricity production, seems to have such a small role. The plan cites the existing Million Solar Roofs initiative as making a 2.1 MMT contribution, and that if the goal for the program is raised from 3,000 MW to 5,000 MW that this will result in another "up to 1 MMT" of GHG reductions. A few points:

First, it appears that the CSI is far short of its goals in terms of installed capacity. The CSI is charged with achieving 3000 MW of production by 2017. In 2008, the CSI administrators estimate that the program will add 100MW total for the year. With CSI's decreasing incentives and limited applicability, California is likely to fall far short of the 3,000 MW goals with the current program design.

While increasing the goal is appealing, it may be very unrealistic given the current CSI model. If we can't reach 3,000 MW with the current model (and the incentives are decreasing) how will we ever attain 5,000 MW? (This same issue surrounds the RPS requirement: How will we get to 33% by 2030 when we can't reach 20% by 2010?)

Under current guidelines, the residential distributed generation incented by the CSI does not count toward the utilities' RPS targets.

Fourth, there is a major flaw in the CSI. Because it is a net metering program, it excludes all multi-tenant properties with individually metered units and excludes all properties that do not use much electricity. Given California's net energy metering rules, and Santa Monica's preponderance of multi-unit apartments and commercial buildings, major sectors are "boxed out" of the CSI. With over 40,000 apartment units - ( and only 8,000 single family homes) - the CSI is not available to a major proportion of the building stock. Without modifications to the solar rules, Santa Monica will not attain its goals for GHG reductions and energy sustainability.

#### Our Specific Suggested Addition

A striking feature of the Scoping Plan is the limited role played by solar. Imagine that less than one percentage point or two of the 169 MMTCO2E reduction goal is expected to be fulfilled by solar. Given Southern California's abundant sunshine and major air conditioning demand, solar can play a far greater role and make a far greater contribution. Consider the following:

The California Solar Initiative - despite its wonderful intent and incremental success - appears to be falling well short of its goals. While reservations dominate the activity, and result in drops in the "degressive" incentive structure, there have been relatively few installations. With incentives stepping down, and federal tax credits in jeopardy, and shortages of panels on the market, the solar future in California is in jeopardy. Clearly we need a more aggressive solar strategy. Germany's feed-in tariff, in stark contrast, has resulted in that country's quick rise to solar prominence. The tariff allows anyone - from homeowner, to commercial property owner, farmer, church, etc. - to sell the output of a solar system at a clearly profitable price. Last year, in Germany, photovoltaics provided over 1,000 MW of new electric capacity, while California installed less than 100 MW. Despite average "insolation" of 3.5 hours a day - like Fairbanks, Alaska - Germany's incentive program spurred its renewable energy industry. Over 55,000 German workers are now researching and making and selling solar technologies throughout Germany, Europe, and around the world. California's average "insolation" is greater than Germany's and therefore would require a lower (less subsidized) tariff.

For California to increase its GHG contribution from solar systems

- both solar photovoltaics and solar thermal systems - there needs to be a new and more aggressive model. The feed-in tariff provides such value to the global community: We need and want solar, so let's adopt a working model. We urge that the feed-in tariff mechanism - complete with clearly profitable pricing - be included in the California Air Resources Board strategy.

Finally, introducing an omnibus feed-in tariff for renewable has proven to be a challenging legislative pursuit. Various bills have been promoted to bring this mechanism to California. However, the very minor feed in tariff programs that are in place in California are priced so low that they will not result in significant new solar projects.

Providing a first step that squarely addresses Santa Monica's housing stock is logical: Solar Sana Monica asks that the final CARB report include and endorse a solar feed-in tariff that requires utilities to purchase all power generated by PV systems on all multi-metered buildings at a price that will cover the system owner's costs plus a reasonable profit. Later this can be broadened to cover a) other renewable energy technologies, and b) t the application of the feed-in tariff to other categories of solar applications (including other building and non-building categories).

Therefore, given Santa Monica's experience with currently available renewable energy programs, and our general comments to the plan, we present a specific suggestion, namely, that California adopt a feed-in tariff for renewable energy resources. Just as Germany, Spain, Italy, South Korea and others have done, we urge CARB to include such a mechanism in the final plan. Feed-in tariffs work... and are a strategy that will help you reach your goals while assuring a safe and sustainable energy future for California.

Thank you again for the opportunity to submit these comments.  
Sincerely and for the Solar Santa Monica Advisory Board,

Ted Flanigan, President of EcoMotion  
Solar Santa Monica Facilitator

Susan Munves  
Energy and Green Building Program Administrator

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 15:14:47

No Duplicates.

## **Comment 203 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Dennis

Last Name: Murphy

Email Address: dennis@potterdrilling.com

Affiliation:

Subject: Addition by Subtraction: The Central Role of EE and Ground Source Heat Pumps

Comment:

The yawning gap, usually rendered in bright PowerPoint yellow, between the AB32 GHG reduction targets and the ability of alternative energy technologies to fill them should really focus the collective Californian mind towards the second of the Big Four strategies, which promotes the launching of a very ambitious energy efficiency program, hopefully one the likes of which we have not seen before.

Sadly, there is no mention within the report of the potentially huge strategic impact that ground source heat pumps (and community-level direct use networks) can have upon drastically reducing natural gas demand, smoothing out peak electricity loads and delivering clean, non-combustion-based heating, cooling and hot water.

Solar PV and solar water heating enjoy very visible and significant state incentive and rebate programs such as the three billion Million Solar Roofs Initiative and the more modest \$25 million Solar Thermal market build. Unfortunately, relatively little attention has been given to energy efficiency measures overall and much less still to GSHP technologies, which really need be included in similar state incentive programs.

It is often said that the most efficient power plant is the one you do not have to build. Serious consideration should to be given to the massive amount of Negawatts and Negatherms that can be created from greater adoption of GSHP, a supreme energy efficiency technology considered by both the EPA and the DOE the most effective way to heat and cool buildings.

As the infamous Art Rosenfeld slide comparing the power and economic output of the gargantuan 3 Gorges Dam project to the potential power and money saved by Energy Star-level refrigerators and air conditioners attests, energy efficiency can yield a mighty impact if only let loose.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/418-3\\_gorges\\_vs.\\_energy\\_efficiency.jpg](http://www.arb.ca.gov/lists/sp-general-ws/418-3_gorges_vs._energy_efficiency.jpg)

Original File Name: 3 Gorges vs. Energy Efficiency.jpg

Date and Time Comment Was Submitted: 2008-08-01 15:27:14

No Duplicates.

## **Comment 204 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Bill  
Last Name: La Marr, Executive D  
Email Address: billlamarr@msn.com  
Affiliation: California Small Business Alliance

Subject: Comments: Draft AB 32 Scoping Plan  
Comment:

August 1, 2008

Mr. Robert DuVall  
California Air Resource Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: Comments: Draft AB 32 Scoping Plan

Dear Mr. DuVall:

The members of the California Small Business Alliance appreciate the opportunity to comment on the Climate Change Draft Scoping Plan, pursuant to AB 32, the California Global Warming Solutions Act of 2006.

The businesses in California, particularly those belonging to the Alliance, have struggled for decades to reduce the overall emissions from the many different processes they use in the conduct of their operations. By every acceptable method of measuring the effects of pollution, the quality of the air in California - especially the South Coast Air Basin - is remarkably improved owing, in large measure, to the significant and unrelenting efforts and investments by stationary sources. Businesses in the South Coast have applied pollution control equipment and methods that go much higher on the marginal cost curve than those in other parts of the United States. Because California environmental regulators often face political and legal difficulties in reaching the sources of about 90% of air pollution, i.e., from boats, trains, airplanes and motor vehicles, the burden of squeezing out extra reductions for each successive State Implementation Plan has continually fallen to stationary sources.

Alliance members understand that there is still more to do to improve our environment and public health. A small business owner, more than anyone else, knows the value of being energy efficient. And both employers and employees have suffered from sticker shock this year when refueling company-owned or private vehicles.

But, while we may embrace the concept of the Plan, we are far less supportive of the way in which it is structured. In fact, we believe that the suggested command and control measures place an unreasonable burden on stationary sources to meet the 2020 baseline objectives.

The matter of providing necessary protocols that will enable stationary sources (businesses) to access adequate streams of affordable emissions reductions credits (ERCs) should be of primary concern to all stakeholders. As written, the Plan imposes severe restrictions on offsets. We believe that all verified offsets should be eligible for compliance use. On balance, we believe that mandatory facility audits and controls are not appropriate. The market will create a sufficient incentive for facilities to find and implement cost-effective reductions. The time for imposing substantial new reduction responsibilities is not the time to further restrict the means of obtaining such reductions. Further, given the nature of greenhouse gases, and the way that these affect the atmosphere, there is a strong case for worldwide trading of CO2 reductions. Certainly, it is folly to restrict trades to single neighborhoods.

With respect to energy efficiency, we believe that stationary sources should be able to get credit for such improvements or for investments in renewable energy strategies.

Simply stated, we believe that layering command and control on top of any market program will increase costs by making greenhouse gas (GHG) reductions unavailable for trading.

Finally, we believe that California should phase in its program using carbon intensity benchmarks instead of imposing facility caps, at least until there is a broad regional or national GHG proposal, if that ever comes to pass.

The Alliance is a non-profit, non-partisan coalition of many of California's most recognized trade associations. Collectively, these associations are committed to providing small business with a unified voice on matters involving the environment, economy, workplace issues, and legislation that have the potential to influence the business operations of their members and the economic health and welfare of the people they employ. Some 20,000 companies belong to our trade association members. Nearly all of these small businesses are classified as "manufacturers." Most of them compete in the global marketplace and provide good jobs and benefits for thousands of productive workers, many with disabilities. Suffice it to say, the vast majority of these employers and employees are also registered voters.

As mentioned earlier, we thank you for the opportunity to comment on this most important plan. Further, we want you to know that we stand ready and willing to offer our collective experience and expertise in helping you to resolve any aspect of the plan that would impact our members.

Sincerely,

Ivan Tether,  
President  
California Small Business Alliance

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 15:27:28

No Duplicates.

**Comment 205 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gordon

Last Name: Nipp

Email Address: gnipp@bak.rr.com

Affiliation: Kern-Kaweah Chapter, Sierra Club

Subject: AB 32 Scoping Plan Comments

Comment:

Some of the Kern-Kaweah Chapter, Sierra Club, comments are  
attached.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/421-carb\\_letter\\_on\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/421-carb_letter_on_scoping_plan.pdf)

Original File Name: CARB letter on scoping plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 15:53:39

No Duplicates.

**Comment 206 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals

Subject: Comments on Proposed Emission Reduction Measures

Comment:

Comments on Cap and Trade, Sector-Based Measures, Energy Efficiency  
Audits, and the Low Carbon Fuel Standard combined in a single  
letter. (attached)

Attachment: [www.arb.ca.gov/lists/sp-general-ws/422-air\\_products\\_general\\_comments\\_-  
\\_june\\_2008\\_draft\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/sp-general-ws/422-air_products_general_comments_-_june_2008_draft_scoping_plan.doc)

Original File Name: Air Products General Comments - June 2008 Draft Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-08-01 15:55:07

No Duplicates.

**Comment 207 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Art

Last Name: Leahy

Email Address: kessner@octa.net

Affiliation: Orange County Transportation Authority

Subject: OCTA's Initial Comments Regarding the Draft Scoping Plan

Comment:

Please find OCTA's initial comments regarding the AB 32 Draft  
Scoping Plan in the attached document.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/423-octa\\_initial\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/423-octa_initial_comments.pdf)

Original File Name: OCTA Initial Comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 16:04:15

No Duplicates.

**Comment 208 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Steven

Last Name: Goetz

Email Address: sgoet@cd.cccounty.us

Affiliation: Contra Costa County

Subject: General Comments

Comment:

General Comment

The web page for collecting comments on the Scoping Plan is difficult to use. The organization of the web page does not appear to be consistent with the organization of the document. It also makes it difficult to be a participant in this review if the State only encourages submittal of comments electronically. Public outreach for the Scoping Plan could be broader.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:08:11

No Duplicates.

## **Comment 209 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Margaret  
Last Name: Bruce  
Email Address: mbruce@theclimategroup.org  
Affiliation: The Climate Group

Subject: General Comments on Draft Scoping Plan  
Comment:

AB 32 Scoping Plan  
Ms. Mary Nichols  
Chair  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

Dear Ms. Nichols, honorable members of the Air Resources Board and members of the Board staff;

Thank you for the opportunity to provide comments on the Draft AB32 Scoping Plan. As you may already know, The Climate Group works at the State, National and International level to advance business leadership on climate change. Our business members include many who were strongly supportive of AB32. The Climate Group would like to recognize California's leadership on the complex range of issues involved with successful implementation of AB32, acknowledge the hard work and careful thought of the many ARB staff members contributing to this document, and convey our general support for this initial Draft Scoping Plan. The following summary remarks offer our suggestions for refinements, further thought, or inclusion into the next revision of the Scoping Plan. We look forward to participating in future workshops and to providing additional input.

### State Operations

The Climate Group (TCG) supports and applauds the state's desire to lead by example. As important as this issue is, and considering the potential long-term benefits, it is critical to implement more detailed and complete Climate Action Plans for each State agency or department, which would include such actions as:

- Conducting a comprehensive inventory of State buildings and plan for systemic energy audits and cost-effective retrofit programs.
- Encourage innovation and an appetite for accelerated change among State employees by rewarding these behaviors; in performance reviews, merit pay increases, bonuses, and other forms of recognition.
- Establish goals and measurable outcomes by State agency and the State overall.
- Including creation and periodic updates of supporting state policies such as "green" procurement plans, contracting and purchasing rules.

Clearly, many of these elements tie back to the assessment of the

State's carbon 'Shadow' and can, when implemented, create profound change.

The acknowledgement of the State's "Shadow" footprint is very important, and TCG would like to recognize the State's leadership and vision in including this important aspect. Please consider framing the evaluation of this in a much more comprehensive and formalized manner. In fact, the complexity of this issue seems to call for a separate 'scoping plan', as thorough and detailed as the initial AB32 Scoping Plan itself. TCG strongly encourages a deep and detailed assessment, utilizing the expertise of the State's economics expertise in academia, and including the State's income, business, sales and property tax agency representatives at State and local levels. There must be a structural alignment of fiscal, tax and business-related policy with climate policy in order to create broad and effective change.

In order to be most effective, and to integrate data from state and regional work on climate change and other environmental programs, TCG strongly recommends that the State consider utilizing (or encouraging the utilization of) a web-based, visual and interactive, 'real time' display of the status of the State's attainment of its climate (and other environmental) goals.

#### Cap and Trade

TCG supports the diverse set of market-based emissions reduction mechanisms presented in the Scoping Plan, including:

- Cap and Trade, with
  - o no artificial price caps or other safety valves (except offsets);
  - o the ability to link to and be fungible with other compatible frameworks nationally and internationally, with a view to creating a large and liquid international market;
- Implementing rigorous standards for regulatory certainty and transparency
- Ensuring that toxic or criteria pollutants are not increased as a result of Cap and Trade actions.

In order to avoid unnecessary controversy, ARB should clearly state its criteria for 'linkage'. TCG urges that to avoid the possible perception of or the actual exporting of 'harm', his standard should be the same as the criteria for Cap and Trade in the AB32 statute.

#### Offsets

We are very supportive of the use of quality offsets and believe offsets should meet high standards for both voluntary and compliance offsets. TCG recommends the Voluntary Carbon Standard (VCS) as a good template for judging and assessing offset quality.

The Scoping Plan suggests a target of not more than 10% of regulated emissions as being eligible for offsetting. An explanation of the rationale for this number, and some discussion of geographic boundaries, standards of reporting and accounting and other details, would be helpful to avoid controversy and disagreement. TCG looks forward to more detailed analyses and discussion on this issue.

#### Distribution of Allowances

TCG believes that most if not all of the allocations should be auctioned so that revenues can be returned to actions supporting emissions reductions and assisting those sectors and communities facing the most difficult technical, market, or economic circumstances. There are lessons to be learned from Europe's experience in this regard.

During the July 17th Scoping Plan workshop, many who commented had recommendations for the use of these potential revenues. TCG suggests that some kind of prioritization criteria or other weighting factors be developed. In that way, decisions about revenue allocations are less likely to be perceived as being manipulated for other purposes. The criteria could be re-assessed at each 5 year Scoping Plan update.

#### Renewable Portfolio Standard (RPS)

Presently the 33% goal for state-wide renewable power content is not in statute. As with the present constraints on implementing the Pavley legislation, consideration should be given to how the goals of AB32 will be met if the 33% RPS doesn't become statute when envisioned or at all, or for some other reason is not achievable. Additionally, some discussion of the challenges faced by the utilities in accomplishing the 33% RPS, such as transmission constraints, may serve to bring attention and assistance to the issue.

#### Fees

It would be helpful to see a more detailed explanation of why the "Carbon Fees" proposal (beyond the nominal fees establishing a revenue stream to cover administrative costs) was not recommended at this time.

Additionally, any AB32 fee program should be sensitive to the impact of additional costs on the low-income and small business community.

In 2006, the initiative Proposition 87 was placed on the ballot. This initiative would have charged a 'severance fee' on the extraction of oil and gas in California. Ironically, California is the only oil and gas producing state not charging such a fee. While TCG has no position on whether or not such a fee should be imposed, it is something we would recommend is included in the economic analysis work presently underway.

#### Fee and Auction Revenues

TCG supports the categories of possible funding recipients, and encourages a broader application of these funds - specifically to include infrastructure investments where there is a clear and quantifiable emissions reduction, public health or adaptation benefit, or leverages additional progress in low-carbon energy sources, such as through improved grids or transmission systems.

TCG suggests that great care should be taken when establishing the mechanism or organization that collects and holds these fee or auction revenues. The State's highway investment funds (and other fund pools) are regularly tapped by the state during fiscally lean times. Because reliable funding streams are so important to establishing and maintaining the trajectory toward a low-carbon

economy, the revenue pool should be carefully safeguarded from such access.

#### Information and Communications Technology (ICT)

Utilization of information and communications technologies can enable significant energy and resource efficiency improvements.

- The role and application of ICT should be enhanced. ICT (See TCG's [www.Smart2020.org](http://www.Smart2020.org)) is increasingly important as a set of enabling technologies. For example: smart meters, real-time energy management and demand response tools, enabling grid to transportation technologies, improving distribution and logistics, improving automobile performance, transmission and generation, land use and transportation modeling, intelligent transportation systems, and many other applications.
- There are many California-based ICT companies, providing jobs and local revenues.

#### Public/Private Partnerships

As the State local or regional governments strive to address the challenges of climate change, in addition to meeting the infrastructure, development, transportation and utility needs of their citizens while resources are often constrained, TCG encourages the consideration of Public/Private Partnerships as a potential means to achieve needed outcomes. In the evaluation of the State's "Shadow" footprint, opportunities to utilize public/private partnerships (or lack thereof) should be included.

#### Building Codes and Standards, Appliance and System Efficiency

The new "Green" Building Standards code for 2010 mentioned in the Scoping Plan and adopted by the State's Building Standards Commission on July 17th, is a good beginning. However, advancements in building materials, energy systems, lighting, plumbing, motors and pumps, HVAC systems, etc. often outpace their governing codes. Without codes and their implementing agencies enabling and encouraging the utilization of viable new technologies or materials, innovation and new business is stifled. Therefore, TCG suggests that the Scoping Plan recommend:

- More frequent updates of building and related codes
- The creation of a State website to educate builders, architects, planners, local code and permit enforcement staff, and consumers about the different standards: Title24, green building standard, energy star, LEED levels, Build It Green, etc.
- Creation of a State-sponsored (though not necessarily run) new technologies "Clearing House" to accelerate adoption of new products and practices.
- Creation of a State-sponsored (though not necessarily run) local government staff 'continuing education program' to disseminate and accelerate green building practices.

#### Fuels/Low Carbon Fuel Standard

With regard to the utilization of biofuels, there are some lessons learned from MTBE as a fuel additive. Emphasizing just one environmental performance criteria may result in overlooking other negative impacts elsewhere. Therefore, TCG strongly encourages the utilization of a rigorous full cycle environmental impact evaluation (materials compatibility, public safety, environmental fate, etc).

#### Land Use

Land use changes are possibly the most challenging aspect of addressing climate change policy. Changes in policy and practice today will not have measurable impacts for many years, but cumulatively those impacts will probably be the greatest.

Additionally, cities and counties experience a set of perverse fiscal incentives for growth and development that are seldom in alignment with recognized needs for compact development, transit oriented development, residential and commercial retrofits, etc. Moreover, the State may desire consistency and coordination, but cities and counties value autonomy and fiercely guard their independent land-use decision-making authority. This will inevitably lead to conflicts with the State's climate policy priorities. Therefore, TCG suggests:

- A systemic evaluation of fiscal and tax policies related to land use to align incentives (or disincentives) with the State's climate policy priorities (land use subvention rates for Williamson Act lands is one example)
- Policies that discourage or even reverse sprawl. This is of paramount importance in protecting forests, promoting reductions in Vehicle Miles Traveled (VMT), protecting agricultural resources and watersheds.
- Promoting urban forestry for its connection to reducing urban heat islands, carbon sequestration, air quality improvements, and other environmental and aesthetic values.
- The use of public funds to purchase woodlands and forests, as described in the Scoping Plan, is an idea worth exploring further.

The idea to purchase or protect from development agricultural lands, wetlands, grasslands and critical watershed areas should also be considered. But, the use of public monies for these activities should be considered very carefully, with private funds used to leverage public money to the greatest extent possible. Further, undeveloped 'sequestering' landscapes are of varying types, qualities and vulnerabilities to development. A system of prioritization or ranking would be useful for making the best use of limited resources while protecting the most valuable lands.

Inevitably, changes in land use patterns that are responsive to climate policy will be motivated by costs. California's urban form is the result of low cost fuel, and long-standing government funding support for development of roads and highways. Fuel and energy costs will become higher and higher - whether or not AB32 is implemented. It is the State's opportunity (perhaps obligation) to invest in urban forms and transportation systems that are as efficient as possible in order to protect Californians from ever higher energy costs and ensure our future prosperity.

#### Biomass Energy

It is unclear what forms of biomass energy the state is considering. Careful examination of this issue should be conducted to ensure that any biomass energy utilized actually has a positive impact on the environment over its full life cycle.

#### Water

TCG supports further consideration of a state-wide assessment of a public goods charge (PGC) on water deliveries. However, funds derived from this PGC should be used for more than strict water efficiency measures. Improvements in water infrastructure - especially where those improvements make conveyance, provision, use or treatment of water more energy and resource efficient would

serve the goals of AB32 as well as have water reliability co-benefits.

PGC money should also be used to encourage water stewardship appropriate to local watershed conditions and regional delivery systems.

A water-related area the ARB may wish to examine in more detail is the energy generation and emissions reduction potential of municipal waste water treatment systems. Many of these municipal systems are nearing the end of their projected lifespan, and when upgraded or replaced, may be more appropriately configured for emissions capture and energy generation.

#### High Global Warming Potential (GWP) Gasses

Because emissions from these gasses are often associated with more technologically or economically complex situations, TCG would encourage the inclusion in the Scoping Plan of some specific actions or plans aimed at reducing these high GWP gasses. For example: sponsoring sector-specific working groups with technical experts to advance the most promising actionable items (for example, a small retail refrigeration working group). The outcome of these working groups could be specific policy or program recommendations which could inform the ongoing work of the ARB or other agencies, associations and organizations.

#### Local Governments and Regional Targets

The Scoping Plan should make more distinct which aspect of a local government or regional target is for the local government's own jurisdictional emissions, and which relates to the community as a whole.

TCG supports setting regional targets although these regional targets should not be binding as AB32's targets are, nor should they be used to create an additional layer of burdensome administration or bureaucracy, conflicting or inconsistent standards or duplicative compliance requirements.

The Draft Scoping Plan places a great deal of emphasis on the role of Local Governments. However, local governments may view these as 'unfunded mandates'. Unless there are resources identified in equal measure to responsibilities, the ARB's expectations for local government engagement and leadership will not be satisfied.

Local government spending is constrained by requirements for 'nexus' between funding source and expenditure. As such, activities related to climate change (and associated energy efficiency or emissions reductions measures) are typically paid for with general funds. However, general fund resources fluctuate with the economy, are typically over-subscribed by City program needs and would often be insufficient to implement the more complex community-wide programs envisioned by the Scoping Plan. Therefore, TCG encourages the ARB to include the use of local community groups (NGOs, Communities of Faith, Business Groups, Foundations, etc.) that can work collaboratively with local governments to accomplish the goals of regional programs, without the funding and activity constraints faced by local governments.

TCG also strongly encourages the future resources from fees,

allocation auctions or public goods charges be directed in sufficient measure to local governments and/or their community group partners to substantially assist their climate-related activities internally as well as throughout their communities.

#### Transit and Transportation

TCG strongly supports the improvement of transit and transportation systems in order to provide:

- Alternatives to automobile and short-haul air travel so that the state benefits from reduced freeway congestion,
- Reduced transportation-related hazardous and criteria pollutants,
- Expansion of local or regional employment delivering transportation alternatives.

TCG recommends that a common unit of measure be adopted to evaluate the effectiveness of any transit, transportation system, goods movement improvement programs: reduction of VMT. This can also be used as a measure for success in changing land use patterns over time.

The Draft Scoping Plan mentions the High Speed Rail initiative, but there are other regional rail, light-rail, rapid bus, and other transit programs that should be called out specifically and elaborated in a more comprehensive Land Use section of the Scoping Plan, or in a unique section on Transportation. Furthermore, the High Speed Rail initiative is not assured of success. The Draft Scoping Plan should propose alternate transportation-related emissions reductions in the event that High Speed Rail is not implemented as or when envisioned.

#### Recycling and Waste

TCG applauds the inclusion of waste, waste diversion and recycling in the Draft Scoping Plan. However, to be truly effective, more assertive terms than 'move toward' could be applied to the issue of eventually achieving Zero Waste (ZW). One option may be to require local governments to set their own timetables (not exceeding some number of years) for reaching ZW and reporting on their progress on regular intervals.

TCG would encourage very careful consideration of the inputs for biodegradable and/or compostable plastics or related materials. As with many complex environmental and technological issues, waste, recycling and solid waste management can present difficult trade-offs. Just one example is that some jurisdictions may wish to encourage or require more biodegradable or compostable articles (plates, cups, containers, etc.) to reduce inputs to landfills or items presenting a problem as litter. However, as some of these articles are made from food-grade raw materials, their production may add to increased price pressures for regional or even world-wide food stocks (as has been seen in the food/fuel pressures on grains used for ethanol production).

Most local governments are too small to the influence manufactures to change product designs to align with ZW objectives, or to collaborate with them in consumer or product-based campaigns (e.g. recycling, composting, product specifications or substitutions, etc). This is an area the state should provide support and leadership.

#### Emissions Quantification Protocols

TCG strongly encourages the next revision of the Scoping Plan to include a table or a list of all of the ongoing emissions quantification protocols currently in development, under consideration or on a list for future consideration. These protocols, such as those for urban forests, agricultural practices, forest bio-energy resources, etc., are crucial for the rigor, accountability, and transparency necessary for emissions reductions across many sectors.

#### Energy Efficiency - Industrial Audits

The proposed program for larger commercial and industrial facility energy audits and recommendations of cost-effective measures is a good idea. It would be extremely beneficial if the state extended the program for energy efficiency audits to municipalities, and in particular, the water sector which the recommendation does not appear to include. Many studies show that the greatest energy use reductions for any water or waste water treatment plant are through energy efficiency measures.

#### Small and Medium Sized Businesses

This fall, TCG will be releasing a publication, "Guide for a Low Carbon Economy", directed at small and medium sized businesses, which could provide the foundation of case studies, technical information and outreach the State is seeking to order to support this important segment of the California economy. Further, TCG could provide specialized outreach or other support to the ARB in reaching this and other economic sectors of the State.

#### Economic Analyses

TCG eagerly awaits the forthcoming economic analyses discussed at the July 17th Scoping Plan workshop. We look forward to seeing more detailed assessments of:

- The value of 'co-benefits' and costs of 'first costs of compliance'
- Impacts or benefits to disadvantaged communities
- Estimates of cost-effectiveness of emissions reductions from Cap and Trade systems vs. (or in addition to) Carbon Fees.
- An evaluation of the technology and behavior 'forcing' capacities of Cap and Trade vs. (or in addition to) Carbon Fees
- Estimates of the benefits or costs resulting from the re-distribution of funds through the auctioning of allowances and subsequent distribution of those revenues.

Thank you again for the opportunity to comment. The Climate Group appreciates the diligent efforts of the ARB staff and the outstanding Draft Scoping Plan they have produced. We look forward to working with the Air Resources Board and our other member organizations to provide comment and further input on the Scoping Plan as the next versions are released.

Sincerely,

Margaret Bruce  
Western Regional Director  
The Climate Group  
650/305-3060

mbruce@theclimategroup.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:26:09

No Duplicates.

**Comment 210 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: James

Last Name: McGreen

Email Address: jamesmcgreen@yahoo.com

Affiliation:

Subject: increase renewable energy

Comment:

California is in the position to lead the nation and lead the world in renewable energy. 33% is not enough. I believe we can get close to 100% of our energy from renewables, especially including our geothermal access.

PHEV's powered by this clean energy will greatly reduce our emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:26:21

No Duplicates.

**Comment 211 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Giorgio  
Last Name: Piccagli  
Email Address: GAPiccagli@gmail.com  
Affiliation: CPHA-N and SCPHA

Subject: DRAFT Scoping Plan and Public Health  
Comment:

Do not see our comment posted this morning. Posting again in case  
it was not received.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/427-2008\\_joint\\_carb\\_letter\\_fin.doc](http://www.arb.ca.gov/lists/sp-general-ws/427-2008_joint_carb_letter_fin.doc)

Original File Name: 2008 Joint CARB Letter FIN.doc

Date and Time Comment Was Submitted: 2008-08-01 16:30:42

No Duplicates.

**Comment 212 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michael

Last Name: Mielke

Email Address: mmielke@svlg.net

Affiliation:

Subject: The Importance of Regional Partnerships to Realize California's Climate Change Goals  
Comment:

Please see the attached letter from the Silicon Valley Leadership Group, which contains points I will be speaking from at the August 8 workshop.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/428-ab\\_32\\_comment\\_letter\\_--\\_bay\\_area\\_regional\\_compact.doc](http://www.arb.ca.gov/lists/sp-general-ws/428-ab_32_comment_letter_--_bay_area_regional_compact.doc)

Original File Name: AB 32 Comment Letter -- Bay Area Regional Compact.doc

Date and Time Comment Was Submitted: 2008-08-01 16:51:26

No Duplicates.

## **Comment 213 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Sandra

Last Name: Witt

Email Address: sandra.witt@acgov.org

Affiliation:

Subject: Health Inequities and Climate Change Draft Scoping Plan

Comment:

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

I commend your leadership in working with many stakeholders to put together a ground-breaking and visionary plan for reducing greenhouse gas emissions - and consequently improving health conditions - throughout the state of California. I am writing today to highlight specifically the potential impact of Climate Change Draft Scoping Plan on achieving health equity and ask that you take my recommendations into consideration as you move toward a final plan.

Health inequities are pervasive in Alameda County and across California. Studies reveal that these inequitable health outcomes are not adequately explained by genetics, access to health care, or risk behaviors, but instead are to a large extent the result of profoundly adverse social and environmental conditions. An examination of West Oakland, a community situated alongside the Port of Oakland and between two freeways, I-880 and I-580, illustrated this point.

Residents living West Oakland can expect to die, on average, more than a decade before residents of the Oakland Hills and, appallingly, this gap may be increasing. It is clear that one of the underlying causes of this disturbingly large health disparity is the extremely high rates of environmentally-linked disease in West Oakland. People living in West Oakland breathe in 3 times more diesel particles than other Bay Area residents. As a result of the exposure, West Oakland residents experience high rates of diseases such as cancer and asthma. As demonstrated in the West Oakland Health Risk Assessment, West Oakland residents experience 2.5 times greater lifetime risk of cancer than Bay Area residents in general and 80% of this excess cancer risk is attributed to diesel trucks. They have the highest rates of asthma hospitalization in the county - 2.3 times the average - and West Oakland children under five years of age have emergency department visits rates due to asthma nearly three times the county average.

The asthma rates among children are particularly alarming. Asthma is a chronic disease that can lead to irreversible changes in the architecture of the airways in the lungs. The irreversibility of these lung changes is one of the prime reasons that preventing asthma in children by reducing exposure to environmental triggers such as diesel is so critical to avoiding a life plagued by

chronic disease. Additionally, asthma places a burden on the respiratory muscles and heart, therefore potentially exacerbating heart disease, producing heart failure and ultimately increasing the likelihood of heart attacks, the number one killer of West Oakland residents.

The impact of the concentration of environmental hazards in West Oakland is particularly devastating to residents' health because of their social vulnerability. Due to high poverty levels and the prevalence of other psycho-social stressors, as well as a lack of access to healthcare, West Oakland residents are already at risk for poor health outcomes. Additionally, there is increasing recognition that multiple hazards interact and have a cumulative impact on residents.

It is because of the extent and urgency of the health problems plaguing West Oakland and the many other similar communities in Alameda County and across the state that we urge you to consider our feedback on the Climate Change Draft Scoping Plan.

1. Ensure protection for already over-impacted communities. Equity should be at the fore-front of all aspects of the plan, but most importantly, it must be central to measures that have the highest potential for inequitable implementation. As detailed in the draft scoping plan, California is joining the Western Climate Initiative and plans to implement cap-and-trade and carbon offset programs. I have several concerns regarding implementation of this plan and its impacts on low-income communities and communities of color, including those in Alameda County. Mitigation strategies such as cap-and-trade or offset programs must not exacerbate already existing health inequities in low-income communities. As demonstrated, such communities are already unequally burdened by extremely poor environmental conditions and poor health. The final plan must include adequate safeguards for these communities, such as:

- Provisions to prevent "leakage", such as local emissions caps (in addition to regional caps), to ensure that high-impact communities do not experience increased emissions levels while other communities see improvements.
- Re-allocation of funds collected through pollution permits, so that high-impact communities benefit from the pollution permits sold in their areas.
- Technical assistance to ensure that small businesses, especially minority and women owned businesses, are able to reduce emissions without undue financial strain.
- Ensure offset activities take place in local "environmental justice communities," such as tree-planting in areas currently without adequate green space.

2. Generate funds for government programs. Some cap-and-trade models allow polluting companies to recoup most of the financial benefits. However some models, such as cap-and-auction, require firms to buy pollution credits directly from the government, allowing the government to then spend that money on programs for the public good. The final Climate Change Plan must ensure that the system implemented in California allows the government to collect permit fees. Additionally, these funds should be redistributed to create public transit programs, improve walking and biking options, and compensate communities that continue to bear the brunt of pollutant emissions.

3. Land use and transportation policies must be strengthened.

Creating walkable, bikeable, and transit-oriented communities will not only help reduce greenhouse gas emissions, but also decrease California's obesity and chronic illness rates. Encouraging active transport has never been more important than now, the first time in modern history the next generation is expected to live lives that are shorter than ours. Almost one-third of Americans who commute via public transit meet their daily requirement for physical activity (30 or more minutes per day) by walking as part of their daily life, including to and from the transit stop. By assigning stronger emission reduction targets to land use and transit policies, the Final Climate Change Plan can harness a critical opportunity to spur meaningful change in the built environment that will mitigate climate change and improve the public's health.

4. Set strong local greenhouse gas reduction targets. Local greenhouse gas reduction targets both ensure that low-income communities do not receive the brunt of emissions while others benefit from reductions ("leakage") and encourage local governments to pursue smarter land use planning that facilitates walking, biking, and public transit use. While cities and counties should have choice regarding how to meet these targets, they should prioritize measures that improve community health, especially in vulnerable communities. The final Climate Change Plan must provide both financial and technical support to local governments to achieve these changes.

5. Continue and improve public engagement in this process. Current adverse environmental conditions that disproportionately impact low income communities of color, and the resulting health inequities, are too often an indelible reflection of the way decision-making power is shared with these communities. Historical exclusion from decision-making venues has resulted in communities of color and low-income communities that are disproportionately burdened by an abundance of environmental hazards, including toxin-emitting power plants and other sources of noxious pollution. Decision-makers can begin to correct the ill health effects of systematic injustice by creating a truly empowering public process. CARB has already made a tremendous effort in this regard through this open comment period and the many community forums for feedback. We ask that you continue to create opportunities for meaningful engagement in this process as it moves forward into implementation and evaluation.

Thank you for your hard work on this plan and for your consideration of our comments. The extreme health threats of climate change and pollution facing California's residents are numerous. Furthermore, in the U.S., low-income people and people of color are at particular risk in part because their health is already disproportionately compromised, they are more likely to be socially isolated, and they command fewer resources to prepare for and respond to extreme weather events. This was seen in the aftermath of Hurricane Katrina and Rita, as well as in the week-long Chicago heat wave of 1995, both of which are examples of extreme weather events that are expected to increase with climate change.

As a result, we must all accept the weight of this public health crisis and use every measure available to ensure that our decisions reduce health risks to the fullest extent possible. It is truly exciting to part of this process as we take bold steps in ensuring the future of our planet and our communities. We submit

these comments, and strongly urge you to revise the Climate Change Scoping Plan accordingly, to ensure that the final product demonstrates California's strong commitment to reducing health inequities at the same time as reducing global warming and wide-spread health risks. Thank you again for the opportunity to comment and please contact us with any questions or concerns.

Sincerely,

Sandra Witt, MPH, PhD  
Deputy Director of Planning, Policy and Health Equity  
Alameda County Public Health Department

Attachment: [www.arb.ca.gov/lists/sp-general-ws/429-ab\\_32\\_alameda\\_public\\_health\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/429-ab_32_alameda_public_health_comments.pdf)

Original File Name: AB\_32\_Alameda\_Public\_Health\_comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 16:56:47

No Duplicates.

## **Comment 214 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Keith

Last Name: Roberts

Email Address: kroberts@cityofsacramento.org

Affiliation:

Subject: General comments

Comment:

General Comments

1. General Comment: The scope of the Scoping Plan is tremendous. For example the City of Sacramento, a typical city, has approximately 1.3% of the State's population. Based on this, the City's share of various aspects of the plan are:

- 416,000 MWh and 10 million therms need to be saved; this suggests that every building within the City needs to become 10% to 12% more efficient, on the average (page 21).
- 2,500 solar water heaters need to be installed (page 21).
- 13,000- 3 kW (40 MW) solar photovoltaic systems need to be installed by 2017 (Page 30). As of early 2008, the City has 3 MW's of solar installed within City limits and may have 6 MW at end of 2008.
- Per capita water use reduction of 20% achieved by 2020 (page 28).

Much of the effort to achieve the above will rest with our electric and natural gas utilities (SMUD and PG&E), however it seems that great coordination with local jurisdictions will be necessary in order to achieve the goals above.

Consider including some examples of how this plan will affect local jurisdictions and up-play to the extent possible that the State will assist efforts in helping cities fund the implementation.

2. Page 16: Please clarify the banking of CO2. Does this mean that CO2 that is saved during one particular year can be used to offset excess CO2 that is emitted in a different calendar year? I was under the impression that the vintage of a CO2 savings project had to match the vintage of the excess CO2 that is generated.

3. Page 17: Please clarify how the 427 million metric tons that was emitted in 1990 and which is the 2020 goal, relates to the 365 million metric tons identified in Table 4 and Figure 2.

4. Page 46: Define "Valley of Death"

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:58:34

No Duplicates.

**Comment 215 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Hank

Last Name: Ryan

Email Address: [hryan@smallbusinesscalifornia.org](mailto:hryan@smallbusinesscalifornia.org)

Affiliation: Small Business California

Subject: Scoping PlanComments from SB-Cal

Comment:

Please see attached.

Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/431-ab32\\_draft\\_scoping\\_plan\\_comments\\_073108.doc](http://www.arb.ca.gov/lists/sp-general-ws/431-ab32_draft_scoping_plan_comments_073108.doc)

Original File Name: AB32 Draft Scoping Plan Comments 073108.doc

Date and Time Comment Was Submitted: 2008-08-01 17:04:35

No Duplicates.

## **Comment 216 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Andy

Last Name: Thornley

Email Address: andy@sfbike.org

Affiliation: San Francisco Bicycle Coalition

Subject: Comments on Draft AB 32 Scoping Plan Document

Comment:

The San Francisco Bike Coalition (SFBC) applauds the significant work that CARB has accomplished in preparing the draft Scoping Plan. We appreciate the opportunity to provide comments to this watershed document.

SFBC enthusiastically supports the overall effort and goals of this process. We have paid particular attention to the recommendations made in the Transportation and Local Government Actions sections of the Scoping Plan. In addition, we strongly support all of the "Other Measures Under Evaluation" for the transportation sector: feebates, congestion pricing, pay as you drive insurance, indirect source rules for new development, and public education and programs to reduce vehicle travel (p.37-38). These measures are essential to meet the aggressive statewide emission reduction requirements. While we applaud the inclusion of these measures, we believe the current emission reduction estimates are extremely conservative (Table 22, p.40). We believe creating a marketplace that values greenhouse gas emissions will strongly affect consumer behavior and purchases significantly different than business as usual.

Using these "other" measures, we see significant potential to further reduce vehicle miles traveled (VMT) and to integrate land use and transportation planning (smart growth) to enable and bolster no- and low-emission transportation options. We believe that these two concepts need to be considered together in order to achieve the greatest possible statewide emissions savings.

We agree that we CARB's assessment that

"... additional reductions can be achieved by making the connection between transportation and land use. This scenario reflects an increased emphasis on urban infill development: more mixed use communities, improved mobility options, and better designed suburban environments." (ARB Scoping Plan, p.33)

SFBC recognizes, as does CARB, that many of these planning decisions are made at the local and regional levels. However, we think it is essential that the state demonstrate leadership now in setting standards for transportation requirements associated with development (new or infill) and not wait until the next cycle of planning. Our experience indicates that people will walk, bike, and use public transportation in their communities if the options are available and safe. But these options require infrastructure to be developed with these transportation goals at the forefront

rather than taking a distant backseat to automobile infrastructure.

SFBC works with local and regional entities to advocate for bicycling as an everyday mode of transportation. Through this work, we have seen the number of bicyclists increase substantially in San Francisco. Public education, safety and maintenance classes, continued advocacy, and infrastructure improvement are all critical elements of increasing the usage of no- and low-emitting transportation options. Infrastructure improvements include development of transportation corridors with bike lanes, sidewalks, greening of streets, appropriate lighting, vehicle speed limit reductions, and generally developing streets to be used by people rather than just automobiles.

In order to truly address the issue of reducing Vehicle Miles Traveled (VMT), alternatives need to be readily available and supported. Further land use and development (new or infill) needs to support no- or low-emitting transportation options. California cannot continue to grow and develop as it has and reach the goals required by AB32. While some of this work can be accomplished at the local and regional level, the state must play an important role. Similar to the energy efficiency requirements the state place on appliance manufacturers and the building trades, we need to have standards for transportation infrastructure, and indirect transportation emissions associated with land development (new and infill). We encourage action to be taken at the statewide level.

We strongly support CARB's efforts to ensure that the California Environmental Quality Act (CEQA) compliance requirements are adequate to uphold the intent of the law. We also support directing of some portion of potential revenues generated from the emission reduction measures to local governments:

Incentives to local governments - Funding or other incentives to local governments for well-designed land-use planning and infrastructure projects can do much to discourage long commutes and encourage walking, bicycling and use of transit. (p.47-48)

CARB correctly recognizes that measures like Congestion Charging, PAYD, and indirect source fees have a positive economic benefit and reduce greenhouse gas emissions. State government action is essential for at least most of these measures (congestion charging and pay-as-you-drive insurance, for instance), and these measures should be added to the proposed measures rather than included with those "under consideration". They will encourage bicycling, walking, and transit use.

To further facilitate this transition, CARB should auction 100% of all greenhouse gas emission allowances under a cap & trade system, or impose a carbon fee. For every \$1 price per ton (through either allowance sales or a carbon fee), there will be almost \$4 billions dollars in revenue over the 2012-2020 timeframe. Funding for transitioning to a cleaner and more efficient future is the most important priority for use of this revenue. For the transportation sector share of those resources, priorities should include bicycle, pedestrian, and transit improvements in addition to targeting vehicle tailpipe emissions.

We appreciate the opportunity to comment on the Scoping Plan. We

hope to provide further input into this important process.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/432-sfbc\\_carb\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/432-sfbc_carb_comments.pdf)

Original File Name: SFBC\_CARB\_comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 17:07:12

No Duplicates.

**Comment 217 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Addie

Last Name: Jacobson

Email Address: addie@lqei.com

Affiliation: Ebbetts Pass Forest Watch

Subject: Comments on "Sustainable Forests" Section 7 of Draft Scoping Plan

Comment:

Attached please find the comments of Ebbetts Pass Forest Watch.  
Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/433-epfw\\_draft\\_scoping\\_comments.doc](http://www.arb.ca.gov/lists/sp-general-ws/433-epfw_draft_scoping_comments.doc)

Original File Name: EPFW draft scoping comments.doc

Date and Time Comment Was Submitted: 2008-08-01 17:13:15

No Duplicates.

**Comment 218 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Will

Last Name: Semmes

Email Address: will.semmes@dgs.ca.gov

Affiliation: Department of General Services

Subject: DGS Comments on Scoping Plan Draft

Comment:

Please see the attached letter with our comments on the Scoping  
Plan Draft. DGS intends to submit its comments on the Appendices  
by August 11. Thank you, Will Semmes

Attachment: [www.arb.ca.gov/lists/sp-general-ws/434-dgs\\_comments\\_on\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/434-dgs_comments_on_draft_scoping_plan.pdf)

Original File Name: DGS Comments on Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 17:22:26

No Duplicates.

**Comment 219 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 220 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jennifer  
Last Name: Smith Grubb  
Email Address: smithjen@ix.netcom.com  
Affiliation:

Subject: Los Angeles Regional Collaborative for Climate Action and Sustainability Comments  
Comment:

Hello,

Please find attached comments on the AB32 Draft Scoping Plan from the Los Angeles Regional Collaborative for Climate Action and Sustainability submitted by Next 10.

Sincerely,

Jennifer Smith Grubb  
Next 10 Environmental Consultant

Attachment: [www.arb.ca.gov/lists/sp-general-ws/436-ab\\_32\\_la\\_collaborative\\_final\\_letter\\_080108.doc](http://www.arb.ca.gov/lists/sp-general-ws/436-ab_32_la_collaborative_final_letter_080108.doc)

Original File Name: AB 32 LA Collaborative final letter 080108.doc

Date and Time Comment Was Submitted: 2008-08-01 17:44:09

No Duplicates.

**Comment 221 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lisa

Last Name: Hoyos

Email Address: lhoyos@citizen.org

Affiliation:

Subject: cap and trade and WCI

Comment:

California's leadership within the WCI should not be focused upon the development of a cap and trade program, but rather on working with the other jurisdictions to share best practices regarding the direct regulation methods that have made California a leader of environmental regulation. The failure of cap and trade in Europe should teach us that this approach should not be the centerpiece of our collaboration with Western jurisdictions. Start with the historically proven methods first.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 19:10:05

No Duplicates.

## **Comment 222 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: dinda

Last Name: evans

Email Address: dindamcp4@yahoo.com

Affiliation:

Subject: draft scoping plan

Comment:

I hope you recommend the following eight crucial GHG actions for CARB's plan:

- 1) Make big polluters pay for all their emissions. Program revenues should go toward clean technologies, green jobs, and cost-cutting measures for low-income consumers. CARB also should narrowly limit offsets.
- 2) Consider cap-and-auction just one tool among market mechanisms. Other tools should be brought forward more robustly, including feed-in tariffs and carbon fees in the Plan's near-term action agenda.
- 3) Give the 33-percent renewable electricity standard by 2020 the force of law, either through legislation or regulatory action.
- 4) Promote and enable Community Choice Electricity Aggregation (CCA) and its potentially powerful GHG reductions.
- 5) Give more specificity and amplitude to the goal of electrifying transportation, especially greatly expanding ZEV numbers (plug-ins and electric cars) beyond CARB's currently too low projected levels.
- 6) Greatly strengthen the too-modest land use and agricultural sections of Plan.
- 7) Bolster requirements for zero waste and recycling, as well as Extended Producer Responsibility (EPR).
- 8) Ensure that actions to reduce greenhouse gases also help, whenever possible, to clean up California's unhealthy air.

the planet is dying, city by city, nation by nation. Please care.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 20:37:50

No Duplicates.

**Comment 223 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Patrick  
Last Name: Griffith  
Email Address: pgriffith@lacsds.org  
Affiliation:

Subject: LACSD\_Comment\_Letter\_on\_June\_2008\_Climate\_Change\_Draft\_Scoping\_Plan  
Comment:

Attached is our comment letter on the Draft Scoping Plan and its  
Appendices.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/441-  
lacsds\\_comment\\_letter\\_on\\_june\\_2008\\_climate\\_change\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/441-lacsds_comment_letter_on_june_2008_climate_change_draft_scoping_plan.pdf)

Original File Name:  
LACSD\_Comment\_Letter\_on\_June\_2008\_Climate\_Change\_Draft\_Scoping\_Plan.PDF

Date and Time Comment Was Submitted: 2008-08-01 21:50:23

No Duplicates.

**Comment 224 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Val

Last Name: Menotti

Email Address: VMenott@bart.gov

Affiliation: BART

Subject: General - Transit / Land Use / Regional Targets / Cap+Trade

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/sp-general-ws/442-carb\\_draft\\_scoping\\_plan\\_-\\_bart\\_comments\\_\\_08-07-31\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/442-carb_draft_scoping_plan_-_bart_comments__08-07-31_.pdf)

Original File Name: CARB Draft Scoping Plan - BART Comments (08-07-31).pdf

Date and Time Comment Was Submitted: 2008-08-01 21:54:40

No Duplicates.

## **Comment 225 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Andy  
Last Name: Pham  
Email Address: andypham5@yahoo.com  
Affiliation:

Subject: Go Vegie First then Go Green later  
Comment:

According Food and agriculture Organization of United Nation(  
<http://www.fao.org/newsroom/en/news/2006/1000448/index.html>),  
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.

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

I would like to share more information with you. Please go to the  
below websites.

1. <http://www.ecofoodprint.org/climate.html>
2. <http://www.suprememastertv.com>

We have a shot time and few chances to save our planet. I believe  
you will do very well on it. Thanks for all you affords.

Sincerely

Andy Pham

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 22:17:57

No Duplicates.

**Comment 226 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Cathy

Last Name: Karlstad

Email Address: Cathy.Karlstad@sce.com

Affiliation: Southern California Edison

Subject: SCE 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-general-ws/444-  
sce\\_comments\\_on\\_carb\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/444-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 22:39:52

No Duplicates.

**Comment 227 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rick

Last Name: Row

Email Address: rrow@sustainablesiliconvalley.org

Affiliation: Sustainable Silicon Valley

Subject: Sustainable Silicon Valley comments

Comment:

Please find attached comments.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/445-ssv\\_to\\_carb\\_8-1-08.doc](http://www.arb.ca.gov/lists/sp-general-ws/445-ssv_to_carb_8-1-08.doc)

Original File Name: SSV to CARB 8-1-08.doc

Date and Time Comment Was Submitted: 2008-08-01 22:43:08

No Duplicates.

**Comment 228 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: sberlin@mccarthyllaw.com

Affiliation: Northern California Power Agency

Subject: Scoping Plan Comments

Comment:

Attached please find the comments of the Northern California Power Agency on the Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/446-comments\\_to\\_carb\\_re\\_6-26-08\\_draft\\_scoping\\_plan\\_\\_08-01-08\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/446-comments_to_carb_re_6-26-08_draft_scoping_plan__08-01-08_.pdf)

Original File Name: comments to CARB re 6-26-08 DRAFT scoping plan \_08-01-08\_.pdf

Date and Time Comment Was Submitted: 2008-08-01 23:15:43

No Duplicates.

**Comment 229 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gerard  
Last Name: McCabe  
Email Address: gmccabeesq@aol.com  
Affiliation: KPC GEMB ENERGY LLC

Subject: GENERAL COMMENTS  
Comment:

Please find the attached comments

Attachment: [www.arb.ca.gov/lists/sp-general-ws/447-kpc\\_gemb\\_energy\\_llc\\_ab\\_32\\_scope\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/447-kpc_gemb_energy_llc_ab_32_scope_comments.pdf)

Original File Name: KPC GEMB ENERGY LLC AB 32 SCOPE COMMENTS.pdf

Date and Time Comment Was Submitted: 2008-08-01 23:34:46

No Duplicates.

**Comment 230 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Robert

Last Name: Wyman

Email Address: robert.wyman@lw.com

Affiliation: Latham & Watkins

Subject: California Climate Coalition Comments

Comment:

Attached please find the California Climate Coalition comments on the draft AB32 scoping plan, together with the California Climate Coalition "California First" proposal.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/448-ccc\\_comments\\_on\\_arb\\_draft\\_scoping\\_plan\\_final.doc](http://www.arb.ca.gov/lists/sp-general-ws/448-ccc_comments_on_arb_draft_scoping_plan_final.doc)

Original File Name: CCC Comments on ARB Draft Scoping Plan FINAL.doc

Date and Time Comment Was Submitted: 2008-08-01 23:44:34

No Duplicates.

**Comment 231 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Robert  
Last Name: Wyman  
Email Address: robert.wyman@lw.com  
Affiliation: Latham & Watkins

Subject: California Climate Coalition Comments - CA First Proposal  
Comment:

Attached please find the attachment to the California Climate  
Coalition Comments (the "California First" proposal).

Attachment: [www.arb.ca.gov/lists/sp-general-ws/449-california\\_first\\_-\\_full\\_version.pdf](http://www.arb.ca.gov/lists/sp-general-ws/449-california_first_-_full_version.pdf)

Original File Name: California First - Full Version.pdf

Date and Time Comment Was Submitted: 2008-08-01 23:46:00

No Duplicates.

**Comment 232 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Elda

Last Name: Medeiros

Email Address: eldamedeiros@sbcglobal.net

Affiliation:

Subject: AB 32

Comment:

With regard to AB 32 I request that legislation:

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: 2008-08-02 09:27:20

No Duplicates.

**Comment 233 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Cushing  
Email Address: kevincushing@hotmail.com  
Affiliation:

Subject: AB 32  
Comment:

It is important that low-income communities are not harmed, and so please consider the impact on them in your deliberations.

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: 2008-08-02 15:02:21

No Duplicates.

**Comment 234 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Ken  
Last Name: Johnson  
Email Address: [kjinnovation@earthlink.net](mailto:kjinnovation@earthlink.net)  
Affiliation:

Subject: Comments re EJAC meeting of 7/30/2008 and the AB 32 Draft Scoping Plan  
Comment:

To the Environmental Justice Advisory Committee:

I have a number of questions (enumerated below) and concerns about ARB's implementation of AB 32. Many of these issues have been addressed in my previous communications with ARB, but these matters are also within the purview of the EJAC's advisory responsibilities under AB 32. ARB has generally been non-responsive to questions about the meaning and legal interpretation of AB 32, and I encourage the EJAC to communicate with ARB on these issues to bring them within the scope of the "open public process" called for by AB 32, and to clearly establish the legislative policy foundation for ARB's regulatory strategy.

...

Attachment: [www.arb.ca.gov/lists/sp-general-ws/455-kenjohnson\\_2008\\_08\\_04.pdf](http://www.arb.ca.gov/lists/sp-general-ws/455-kenjohnson_2008_08_04.pdf)

Original File Name: KenJohnson\_2008\_08\_04.pdf

Date and Time Comment Was Submitted: 2008-08-03 14:09:42

No Duplicates.

**Comment 235 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Randall

Last Name: Keen

Email Address: rkeen@manatt.com

Affiliation:

Subject: Comments of the County of Los Angeles to the AB 32 Draft Scoping Plan

Comment:

Comments of the County of Los Angeles to the AB 32 Draft Scoping Plan

Attachment: [www.arb.ca.gov/lists/sp-general-ws/460-county\\_of\\_la\\_comments\\_to\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/sp-general-ws/460-county_of_la_comments_to_scoping_plan.doc)

Original File Name: County of LA Comments to Scoping Plan.DOC

Date and Time Comment Was Submitted: 2008-08-04 09:41:24

No Duplicates.

**Comment 236 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Karen

Last Name: Baroldi

Email Address: kbaroldi@ocsd.com

Affiliation: Orange County Sanitation District

Subject: Comment Letter on Climate Change Draft Scoping Plan

Comment:

Please find attached the Orange County Sanitation District's  
comment letter on the Climate Change Draft Scoping Plan. Thank  
you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/461-ocsd\\_ab32\\_scopingplan\\_comment\\_letter.pdf](http://www.arb.ca.gov/lists/sp-general-ws/461-ocsd_ab32_scopingplan_comment_letter.pdf)

Original File Name: OCSD\_AB32\_ScopingPlan\_Comment\_Letter.pdf

Date and Time Comment Was Submitted: 2008-08-04 10:37:26

No Duplicates.

## **Comment 237 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Joyce M

Last Name: Eden

Email Address: comment@sonic.net

Affiliation: West Valley Citizens Air Watch

Subject: General

Comment:

West Valley Citizens Air Watch (WVCAW) Comments:

General 1)

Reduction of Green House Gases (GHG) need to be linked in tandem to reductions in toxic air contaminants (TAC) and other harmful air pollutants. We ask that California Air Resources Board (CARB) remain clear at all times not to trade off one for the other.

While in many cases, reduction in one category will achieve reduction in the other, this is not so across the board.

General 2)

Even with increases in population, if California agencies, boards, the legislature and the governor are serious regarding GHG reductions, they can accomplish significant reductions in the amount of electricity needed to be generated to support California residents and businesses.

If GHG emissions is a critically serious situation for our planet, it is time to think outside the box. For example, consider that when the engineered "energy crisis" of 2000 and 2001 was taking place, and PG&E went bankrupt, the governor and legislature could have created out of it a regional public utility. After all, the public already subsidizes much of the infrastructure upon which the utility is built and electricity is after all a necessary public good.

Keeping the profit margin along with shareholders demanding ever increasing profits in the equation is diametrically opposed to reducing both the monetary costs to the public and the amount of electric generation. Taking the profit motive out of the equation will lead to lower prices and public buy-in of reductions for environmental protection.

An illustrative example are the two electric generators in Cleveland, Ohio, one public and one private. The public served by the public utility pays lower electric costs and has more money left in their bank accounts than those served by the private for-profit company. The electricity works the same.

Another advantage of a public utility is transparency. Documents regarding pricing and pollution would be available to the public -- should not the public be able to review these important considerations? We think so.

General 3)

The Cap and Trade scheme has been found to have failed in the European Union. Are we going to follow on with the same failed scheme? It's a bad idea whose time has past. Let's keep it there.

General 4)

Passive solar buildings, photovoltaics, wind power, insulation, substitution of lower Carbon Intensity Factor (CIF) materials, awareness and reduction in waste are some of the contributors to this future reduction. Californians have already proven they can reduce their per capita use of electricity. Yet so much waste and unnecessary expenditure of electric power remains for the picking. This, with no reduction in quality or enjoyment of life.

General 5)

West Valley Citizens Air Watch asks to be included as a Stakeholder for purposes of AB 32 regulation development and related regulations and issues. We ask to be included in any meetings, discussions, rule making and regulation development regarding cement kilns, cement production, uses of concrete and alternatives to limestone clinker, cement, and concrete.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 11:39:50

No Duplicates.

**Comment 238 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Tom

Last Name: Faust

Email Address: tfaust@redwoodrenewables.com

Affiliation: Redwood Renewables

Subject: California Needs Residential Feed in Tariffs

Comment:

Over 450 Million citizens in Europe and elsewhere are successfully using a Feed In Tariff mechanism to stimulate their renewable energy portfolio. Feed in Tariffs make sense because you can use the residential rooftop to make your own energy plus make enough energy to power your PHEV. With new July 2008 technology developed by MIT, you will be able to manufacture your own hydrogen gas to heat your own home too. California has twice the sun of Europe yet we have no economic incentives to change the status quo. With a FIT program in place Germany now produces more Renewables than California. By 2012 Germany will exceed a 20% production of Renewables by using their FIT.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 11:42:46

No Duplicates.

## **Comment 239 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jacob

Last Name: Tobias

Email Address: jtobias@sf.wrtdesign.com

Affiliation:

Subject: Land Use and Transportation Approach

Comment:

The plan is remarkably timid in its approach to land use and transportation. Reducing automobile travel and creating more walkable and transit-oriented developments will reduce emissions. It will also provide a wide array of other benefits, such as encouraging more active lifestyles, providing a range of housing choices, and reducing dependence on expensive foreign oil. CARB needs to do more to take advantage of a strategy with so many benefits.

- 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: 2008-08-04 17:58:11

No Duplicates.



**Comment 240 for General Comments for the GHG Scoping Plan (sp-general-  
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 tAir Resources Board on  
8/1/08

Attachment: [www.arb.ca.gov/lists/sp-general-ws/467-300226001nap08010801.pdf](http://www.arb.ca.gov/lists/sp-general-ws/467-300226001nap08010801.pdf)

Original File Name: 300226001nap08010801.pdf

Date and Time Comment Was Submitted: 2008-08-04 19:03:09

No Duplicates.

**Comment 241 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

## **Comment 242 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jimalee  
Last Name: Plank  
Email Address: jimalee\_p@hotmail.com  
Affiliation:

Subject: draft AB32 Scoping plan  
Comment:

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,

Jimalee Plank

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-05 09:49:06

No Duplicates.

**Comment 243 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 244 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 245 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 246 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Henry

Last Name: Gardner

Email Address: cseghers@arb.ca.gov

Affiliation: Association of Bay Area Governments

Subject: Draft Scoping Plan

Comment:

please see attached comments

Attachment: [www.arb.ca.gov/lists/sp-general-ws/473-7\\_31\\_08\\_associationofbayareagovernments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/473-7_31_08_associationofbayareagovernments.pdf)

Original File Name: 7\_31\_08\_associationofbayareagovernments.pdf

Date and Time Comment Was Submitted: 2008-08-05 11:43:39

No Duplicates.

**Comment 247 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Gavric

Email Address: cseghers@arb.ca.gov

Affiliation: California Association of Realtors

Subject: Draft Scoping Plan

Comment:

please see attached comments

Attachment: [www.arb.ca.gov/lists/sp-general-ws/474-7\\_16\\_08\\_californiaassociationofrealtors.pdf](http://www.arb.ca.gov/lists/sp-general-ws/474-7_16_08_californiaassociationofrealtors.pdf)

Original File Name: 7\_16\_08\_californiaassociationofrealtors.pdf

Date and Time Comment Was Submitted: 2008-08-05 11:46:23

No Duplicates.

**Comment 248 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 249 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Philip

Last Name: Ratcliff

Email Address: skazz999W@netscape.net

Affiliation:

Subject: Draft Scoping Plan

Comment:

It seems that every day, I read another item about a huge chunk of ice breaking free from the Antarctic ice shelf, or about open water at the North Pole. Each year, the Arctic Sea ice forms later, and melts earlier.

The human race is gambling with its future, if it doesn't quickly, decisively, and resolutely attack global warming. I think that it will take a catastrophic event to bring action from the nations, and by then it will be too late. Humanity must act before a catastrophic event gets its attention.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-05 12:37:32

No Duplicates.

**Comment 250 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: John  
Last Name: Busterud  
Email Address: jwbb@pge.com  
Affiliation: Pacific Gas and Electric Company

Subject: Comments of PG&E on the CARB's Draft Scoping Plan  
Comment:

August 5, 2008 VIA ELECTRONIC FILING

Ms. Mary Nichols, Chairman  
CALIFORNIA AIR RESOURCES BOARD  
1001 I Street  
Sacramento, CA 95812-2828

Mr. James Goldstene, Executive Officer  
CALIFORNIA AIR RESOURCES BOARD  
1001 I Street  
Sacramento, CA 95812-2828

Mr. Chuck Shulock, Chief  
Office of Climate Change  
CALIFORNIA AIR RESOURCES BOARD  
1001 I Street  
Sacramento, CA 95812-2828

Re: Pacific Gas and Electric Company's Comments on the AB 32  
Draft Scoping Plan

Dear Chairman Nichols and Messrs. Goldstene and Shulock:  
Pacific Gas and Electric Company ("PG&E") welcomes the opportunity to provide these initial comments on the California Air Resources Board's ("ARB") June 2008 Draft AB 32 Scoping Plan ("Draft Plan"). Our comments are summarized in this letter and are set forth more fully in the attached document. Although PG&E addresses the Draft Plan's overall approach and strategy, please consider these comments preliminary as we await the ARB's Supplemental Analyses and continue our review of the Technical Appendices released on July 22, 2008. In particular, we believe that further analyses of the technological feasibility and cost effectiveness of the proposed measures will be essential to allow meaningful public evaluation of the Draft Plan and its impacts.

PG&E and our customers share California's desire to continue leadership on climate change, and this is why we were the first investor-owned utility to support enactment of AB 32. PG&E is a gas and electric utility serving one in twenty Americans and is committed to leadership on climate change. Our customers have invested and continue to invest in customer energy efficiency ("CEE") programs and a clean electric generating portfolio, so

that our emissions are among the lowest of any utility in the nation. During the 2009 - 2011 period alone, PG&E expects to spend nearly \$1.9 billion of customer funded revenue for various CEE programs that will save more than 5,784 gigawatt hours of electricity and 108 million therms of natural gas annually. The GHG emissions associated with the electricity we provide are among the lowest of any large utility in the country, approximately 40% of the CO2 emitted by the average utility. Currently, over 50% of the electricity PG&E delivers to its customers comes from sources that emit no greenhouse gases at all.

PG&E approaches AB 32 implementation guided by five key objectives:

1. Ensure environmental integrity through adoption and use of mandatory, real and verifiable reductions;
2. Manage costs to California consumers and businesses by pursuing cost-effective and technologically feasible reduction strategies and a consumer-oriented allowance allocation approach;
3. Solidify California's national leadership role on climate change by creating a model program that can be integrated effectively with future regional, national and international programs;
4. Equitably apportion reduction obligations to ensure that all sectors pay their fair share. State-wide reduction obligations should be apportioned to ensure that no single source, sector, nor its customers, assumes a disproportionate cost burden; and
5. Rely as much as possible on market and flexible compliance mechanisms to encourage and accelerate the most efficient, cost-effective pathway to sustainable, available emission reductions across all sectors.

With these objectives in mind, the following highlights some of our initial over-arching comments on the Draft Plan.

#### A. The Draft Plan Properly Takes a Comprehensive Approach To Achieving GHG Reductions.

AB 32 calls for ARB to consider three critical questions as it implements measures to meet the AB 32 goals:

1. Will the emissions reduction measures work? For example, are they technologically feasible?
2. Are the emissions reduction measures cost-effective? For example, is each measure cost-effective compared to alternative measures or programs that could be undertaken to achieve the same quantity of reduction?
3. Are the emissions reduction measures fair and equitable when compared to the relative contribution of each source and sector to overall GHG emissions in California?

PG&E recognizes - as does the ARB itself - that the Draft Plan is preliminary in this respect and that a more complete plan will come later this year. We look forward to working with ARB to better define these key issues in the coming months.

It is often said that there is no "silver bullet" to address the challenge of climate change and that is why it is critically important for California to pursue all "technologically feasible" "cost-effective" options to achieve the AB 32 emission reduction targets. The Draft Plan takes an important first step toward this comprehensive approach, relying on a wide range of measures, including market mechanisms and programs.

#### B. PG&E Supports the Draft Plan's Endorsement of Cap and Trade Market Mechanisms to Achieve Verifiable, Timely, and Cost-Effective GHG Reductions.

PG&E supports and commends the ARB's conclusion that a properly designed, multi-sector cap and trade program (and one ideally linked to the Western Climate Initiative ("WCI")) can achieve real, quantifiable, timely, and cost-effective GHG reductions (Draft Plan, p. 15).

Cap-and-trade leverages market forces to pursue and implement the least-cost reductions. Effective use of market mechanisms will drive the development of the next generation of clean, highly-efficient technologies and practices. Indeed, the challenge demonstrated thus far in accurately determining cost effectiveness for a limited number of well established measures illustrates why cap-and-trade is a superior approach for delivering the most cost-effective reductions. As required by AB 32, integration with WCI or a national program will also begin to provide the necessary harmonization of California's market with emerging regional, national and, ultimately international carbon trading programs. Although AB 32 requires that any cap-and-trade program either must be "necessary" or "desirable" - we believe it is both. (HSC § 38561(b).) A well-designed market is "necessary" for leveraging lower cost reductions and "desirable" for spurring innovation that may not come from traditional regulatory programs.

#### C. The Scoping Plan Must Include Cost Effectiveness and Technological Feasibility as Criteria for Evaluating Reduction Measures.

PG&E supports several of the Draft Plan's criteria for developing preliminary recommendations for GHG reduction measures, such as: "Achieve the 2020 Cap"; "Maximize economic benefits and minimize economic harm;" and "Provide leadership and influence other governments;" and "Assure that emissions reductions required of each sector are equitable" (Draft Plan, pp. 49, 50). We believe it critical, however, for the final Scoping Plan to include cost-effectiveness and technological feasibility as core criteria for evaluating GHG reduction measures as required by the AB 32 statute (HSC § 38561(a)). We look to the final Plan to more expressly evaluate cost effectiveness and technological feasibility across all sectors and sources and provide data and analyses to support each of the recommended reduction measures.

#### D. Due to Uncertainties Associated With Some Programmatic Measures, the Draft Plan Should be Open to Greater Reliance on the Broader Trading Market for Cost-Effective Emission Reductions.

As noted above, we support a comprehensive, multi-faceted approach to achieving AB 32's targets. It will take much effort across the California economy to achieve the ambitious objectives called for

by AB 32. We note, however, that the Draft Plan relies heavily on uncertain and potentially infeasible programmatic and regulatory targets. Further, we believe that an over-emphasis on fixed programmatic measures or regulatory programs could come at the expense of developing a more robust and efficient regional, national, and ultimately international trading market, where more cost-effective reductions could potentially be found.

Although we share the goal of increased renewables, there are a number of critical issues beyond our control that must be resolved: (1) adequacy of supply; (2) adequacy and availability of transmission infrastructure; (3) how to integrate new renewable resources into the grid and manage over generation; and (4) renewal of existing federal Production Tax Credits ("PTC") and Investment Tax Credits ("ITC"). For example, regardless of our shared commitment to increased renewables, if ITC and PTC are not extended, some developers may face significant delays or simply not be able to proceed with their projects. While PG&E agrees that the state must address the barriers to 33% now, we believe it is extremely optimistic - given these challenges - to assume a specific level of GHG reductions associated with a greatly increased RPS at this time.

Likewise, an expansion of CHP electric generation sources is only a GHG reduction measure if the additional CHP has true efficiency advantages and is matched against existing thermal load. Based on currently available information, PG&E questions whether capacity exists for the 30,000 GWH of CHP assumed by the Draft Plan to represent GHG reduction opportunities. Cost-effective and efficient CHP in reasonable quantities should need no supporting mandates, as both the industrial sector and the electricity sector will be part of the cap-and-trade market. Indeed, regulatory mandates for CHP could conceivably increase GHG emissions by encouraging inefficient CHP, while a market-based mechanism such as cap-and-trade would provide sufficient incentive for efficient CHP where "business as usual thermal load" exists.

The CEE targets assumed by the Draft Plan rely on extraordinarily ambitious government action, technology advancement, market transformation, and unprecedented customer adoption and rebate levels. The numbers being relied upon in the 2012 - 2020 Plans issued by the California Public Utilities Commission are scheduled to be adjusted in 2010 and we would anticipate costs to increase substantially. The ARB must consider and rigorously evaluate these uncertainties in the Draft Plan CEE targets and consider a broader range of emissions reductions associated with CEE. Most important, if the state is to achieve its CEE targets, it is essential that all utilities - both investor owned ("IOU") and publicly owned ("POU") - contribute their fair share of CEE savings. Additional targets for CEE should be applied first to POUs before looking to expand already ambitious IOU programs. Finally, government codes and standards must be rigorous and strictly enforced if we are to realize projected CEE savings.

PG&E is committed to our current leading energy efficiency and renewables programs, but significantly increased CEE, renewables and CHP mandates with specific, set-aside targets should be de-emphasized when outcomes are so uncertain, technologies are yet to be developed, and costs are indeterminate. As mandates offer little choice in how to meet goals, they should be based on realistic and accepted methodologies. Again, ARB may want to consider greater reliance on the ability of the market to deliver

cost-effective, innovative, and substantial emission-reduction opportunities and less reliance on programmatic measures where California and California's businesses are already taking a bold leadership. By leveraging these market forces to achieve reductions in a cost-effective manner, the Draft Plan will serve more nimbly and effectively as a map with multiple roads to achieving targets in 2020 and beyond.

E. The Draft Plan May Place an Inequitable and Unfair Burden on the California Electric Sector and its Customers.

State-wide reduction obligations should be apportioned under AB 32 to ensure that no single sector, nor its customers, assumes a disproportionate cost or quantitative burden relative to their contribution to state-wide emissions. For example, PG&E is concerned that the Draft Plan may place an inequitable compliance burden on utility sector customers by imposing programmatic measures that have not been shown to be cost-effective or technologically feasible.

In this regard, AB 32 requires ARB to adopt a regulatory program that "takes into account the relative contribution of each source or source category to statewide greenhouse gas emissions," and "consider[s] the significance of contribution of each source or category of sources to statewide emissions of greenhouse gases" and "design the regulations . . . in a manner that is equitable" (HSC §§ 38561(e), 38562(b)(1) and (9)).

PG&E believes ARB should approach the issue of inter-sector equity by ensuring that all sectors bear their fair share of overall GHG reduction costs, based on relative contributions to overall emissions regardless of which sector actually performs the reductions.

F. The Use of Environmentally Sound and Verifiable Offsets Will be Necessary to Meet AB 32's Targets in a Cost-Effective Manner.

PG&E strongly supports the use of offsets as an indispensable tool for reducing GHG emissions outside a cap-and-trade system while controlling the costs of regulated firms complying with emissions targets. To this end, it is important to maintain a balance between supply and demand and to ensure that sufficient liquidity is available in the cap-and-trade market. These objectives will be better achieved with a higher availability of quality offsets.

A robust offset program, governed by rigorous standards, will ensure reductions achieved outside the cap are environmentally equivalent to those that occur at emission sources subject to the cap. Offset protocols should be thorough; and qualifying projects that meet the protocol standards should not be subject to further case-by-case review or discounting. PG&E also believes that ensuring high quality offsets should be our collective focus. In that spirit, the Draft Plan should clearly signal that -- as long as the offsets meet rigorous standards -- there should be no geographic or quantitative limits on their use for compliance purposes.

G. A Successful Cap-and-Trade Program Will Need to Address Key Design Issues Including Allowance Allocation, Cost-Containment Mechanisms, and Apportionment of Emissions Responsibility.

PG&E commends the ARB for its decision to include a cap-and-trade

program as one of the measures in the Draft Plan. As the agency continues to work with the California Public Utilities Commission, the California Energy Commission, the 23 other states and provinces participating in the WCI process, as well as the other important stakeholders, we look forward to more details and principles for design of the trading program. For example, by incorporating cost-containment mechanisms, such as an allowance price "collar" under a cap-and-trade program, policymakers and stakeholders can ensure that long-term emission reduction goals are met, while at the same time providing for an orderly transition to a low-carbon economy through a greater degree of price predictability and reduced price volatility.

For electric sector participation in a cap-and-trade program, PG&E supports the distribution of allowance value for the benefit of electricity consumers, while promoting investment in new low-carbon technologies or programs that also benefit customers and the communities we serve. This is because households and businesses at the end of the electricity supply chain, regardless of the point of regulation, will ultimately bear the costs - in the form of higher electricity prices - of a GHG cap-and-trade program. This is fully consistent with AB 32's requirement that good-faith efforts be made to make opportunities available to disadvantaged communities in California to benefit from measures undertaken to reduce GHG emissions in the state (HSC § 38565). This is particularly important because low-income earners are a large and growing segment of California's population. Therefore, electricity consumers should be entitled to the value inherent in the allowances in order to partially offset increased costs, as well as provide capital to help these consumers transition to a low-carbon economy.

Finally, the design principles for a regional or WCI-based cap-and-trade program should include details on how California intends to apportion its compliance responsibility among all the states in a regional cap-and-trade program. This becomes particularly important for GHG emissions sources located outside California, such as coal- and gas-fired power plants who export their power to California but whose emissions would be regulated directly by the states in which they are located.

H. The Draft Plan Inputs and Analyses of Technological Feasibility and Cost Effectiveness Must be Clear and Available to the Public As Soon as Possible.

PG&E understands that the modeling and analyses of cost effectiveness and technological feasibility are to be addressed and provided to the public in supplemental information prior to issuance of the next iteration of the Draft Plan. However, in light of the great importance of these analytical and modeling issues, we provide initial input in the attached comments regarding possible ambiguities and deficiencies in the assumptions in the Draft Plan. Taken together, correcting these numbers would decrease the GHG reductions associated with the measures by millions of tons. The reductions are in addition to, and distinct from, the uncertainties in implementing the measures described above further underscoring the increased role market-based mechanisms may need to play in meeting AB 32's goals.

Thank you for the opportunity to submit these comments. We look forward to working constructively with ARB, other state agencies,

concerned stakeholders, and members of the public to tackle the challenge of global climate change and to ensure the successful implementation of AB 32.

Very truly yours,

/s/

JOHN W. BUSTERUD

JWB:kp

Attachment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/477-080508\\_comments\\_of\\_pg\\_e\\_on\\_draft\\_scoping\\_plan\\_00065452.pdf](http://www.arb.ca.gov/lists/sp-general-ws/477-080508_comments_of_pg_e_on_draft_scoping_plan_00065452.pdf)

Original File Name: 080508\_Comments of PG&E on Draft Scoping Plan\_00065452.pdf

Date and Time Comment Was Submitted: 2008-08-05 15:38:31

No Duplicates.

**Comment 251 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Helen

Last Name: Bourne

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: Draft Scoping Plan

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/478-8\\_05\\_08\\_helenbourne.pdf](http://www.arb.ca.gov/lists/sp-general-ws/478-8_05_08_helenbourne.pdf)

Original File Name: 8\_05\_08\_helenbourne.pdf

Date and Time Comment Was Submitted: 2008-08-05 15:54:44

No Duplicates.

**Comment 252 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 253 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Aimee

Last Name: Barnes

Email Address: aimee.barnes@ecosecurities.com

Affiliation: EcoSecurities

Subject: EcoSecurities Comments on Draft Scoping Plan

Comment:

Please see attachment for comments by EcoSecurities on draft  
scoping plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/480-ab\\_32\\_comments\\_ecosecurities\\_08-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/480-ab_32_comments_ecosecurities_08-08.pdf)

Original File Name: AB 32 Comments EcoSecurities 08-08.pdf

Date and Time Comment Was Submitted: 2008-08-05 17:24:20

No Duplicates.

**Comment 254 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: The Honorable Dave

Last Name: Jones

Email Address: [assemblymember.jones@assembly.ca.gov](mailto:assemblymember.jones@assembly.ca.gov)

Affiliation: California State Assembly

Subject: Cap & Trade and Land Use Sector

Comment:

Thank you for the opportunity to comment; the attached Word document addresses the cap and trade proposal and the contribution to be made from the Land Use Sector.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/481-scoping\\_plan\\_comments\\_8-04-08.doc](http://www.arb.ca.gov/lists/sp-general-ws/481-scoping_plan_comments_8-04-08.doc)

Original File Name: Scoping Plan comments 8-04-08.doc

Date and Time Comment Was Submitted: 2008-08-05 17:51:04

No Duplicates.

**Comment 255 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Leo  
Last Name: Miras  
Email Address: LeoM@environmentalhealth.org  
Affiliation:

Subject: Scoping Plan Comments  
Comment:

Attached are the Environmental Health Coalition's comments on the  
draft Scoping Plan.

Thank You

Attachment: [www.arb.ca.gov/lists/sp-general-ws/482-ab\\_32-\\_scoping\\_plan\\_comments2.doc](http://www.arb.ca.gov/lists/sp-general-ws/482-ab_32-_scoping_plan_comments2.doc)

Original File Name: Ab 32- Scoping Plan Comments2.doc

Date and Time Comment Was Submitted: 2008-08-06 09:07:43

No Duplicates.

**Comment 256 for General Comments for the GHG Scoping Plan (sp-general-  
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-general-ws/483-  
iep\\_comments\\_on\\_carb\\_climate\\_change\\_draft\\_scoping\\_plan\\_\\_--\\_\\_final\\_\\_8-6-08\\_\\_.doc](http://www.arb.ca.gov/lists/sp-general-ws/483-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 11:47:40

No Duplicates.

**Comment 257 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Annemarie

Last Name: Vincent

Email Address: avincent@sacbreathe.org

Affiliation: Breathe California of Sacramento

Subject: Support with recommendations for the Scoping Plan

Comment:

Breathe California of Sacramento Emigrant Trails is pleased to participate in the public comment period. We appreciate all the work that has gone into the development of this plan and look forward to its adoption.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/484-scoping\\_plan\\_support\\_letter\\_08-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/484-scoping_plan_support_letter_08-08.pdf)

Original File Name: Scoping Plan Support Letter 08-08.pdf

Date and Time Comment Was Submitted: 2008-08-06 12:12:22

No Duplicates.

**Comment 258 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Dorothy  
Last Name: Rockrock  
Email Address: drothrock@cmta.net  
Affiliation: AB 32 Implementation Group

Subject: Scoping Plan & Appendices Comments  
Comment:

RESENDING THIS MESSAGE -- LAST MESSAGE THE DOCUMENT WOULD NOT  
OPEN.

Attached please find a letter to Chairwoman Nichols on behalf of  
the AB 32 Implementation Group. The AB 32 Implementation Group is  
co-chaired by Dorothy Rothrock with CMTA and Amisha Patel with  
California Chamber of Commerce.

If you have any trouble opening this attached document, please let  
me know.

Thank you.

Shelly Sullivan, Executive Director  
AB 32 Implementation Group  
(916) 858-8686

Attachment: [www.arb.ca.gov/lists/sp-general-ws/487-scoping\\_plan\\_comments\\_to\\_carb\\_8-6-08-1.doc](http://www.arb.ca.gov/lists/sp-general-ws/487-scoping_plan_comments_to_carb_8-6-08-1.doc)

Original File Name: Scoping Plan Comments to CARB 8-6-08-1.doc

Date and Time Comment Was Submitted: 2008-08-06 14:06:13

No Duplicates.

**Comment 259 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

Subject: SMUDs Comments  
Comment:

Submitted August 1. Please call Araceli if there are any questions.  
916 732-6447

Attachment: [www.arb.ca.gov/lists/sp-general-ws/488-smuds\\_comments\\_on\\_po\\_and\\_ed\\_for\\_ab\\_32\\_dsp.pdf](http://www.arb.ca.gov/lists/sp-general-ws/488-smuds_comments_on_po_and_ed_for_ab_32_dsp.pdf)

Original File Name: SMUDs Comments on PO and Ed for AB 32 DSP.pdf

Date and Time Comment Was Submitted: 2008-08-06 14:49:12

No Duplicates.

## **Comment 260 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jim  
Last Name: Gray  
Email Address: citycouncil@roseville.ca.us  
Affiliation:

Subject: City of Roseville comments on Climate Change Draft Scoping Plan  
Comment:

August 4, 2008

Mary Nichols  
Chair, California Air Resources Board  
Sacramento, CA 95814

RE: Climate Change Draft Scoping Plan

Dear Chair Nichols:

The City of Roseville is pleased to submit the following comments on the California Air Resources Board (ARB) Draft Scoping Plan (Scoping Plan). We appreciate the scale and scope of this effort, and recognize that local governments will have an important role in meeting the mandates of AB 32.

The City of Roseville is proud to be the first city in the Sacramento region to adopt the Sacramento Area Council of Governments (SACOG) Implementation Strategies to Achieve Blueprint Project Objectives, in 2005. Roseville also received the SACOG Blueprint Excellence Award, and the League of California Cities Helen Putnam Award for Planning and Environmental projects, for the City of Roseville Blueprint Implementation Strategies. Additionally the City is proactively complying with AB 32, finalizing the City's operational inventory and exploring funding opportunities for preparation of a Climate Action Plan. The City has already implemented a number of sustainable programs, including:

- A Citywide "Green Team" develops innovative programs and policies to address land use and green building, utilities, green energy, transportation, public outreach, and recycling.
- Energy Efficiency Incentive and Rebate Programs (including photovoltaic and efficient appliance rebates)
- Innovative recycling programs (the first city in the region with a Styrofoam recycling program)
- City of Roseville General Plan has been updated to address Global Climate Change, and identify existing policies that reduce greenhouse gas emissions
- The City's BEST Homes program utilizes rooftop solar electric generation technology, high energy efficiency, water efficiency and shade trees as a standard feature in homes. Through BEST Homes, Roseville Electric offers developers up to \$8,600 in rebates for each participating dwelling unit. In fiscal year 2007/2008 over 20% of new home permits participated in the

program.

These and many other programs to help us meet the challenge of reducing greenhouse gases while being fiscally and environmentally responsible are documented in the City's Sustainability Initiatives Report (attached)

#### General Comments

##### Local government must retain clear land use authority

We are concerned that ARB has received numerous comments, both written and verbal, from environmental interests and other parties requesting more emphasis on land use control in the Scoping Plan. We urge you to equally consider the input of local governments, as the entities that actually process development projects from start to finish, and negotiate all of the associated complexities, on a daily basis. As a City that is actively implementing the Blueprint principles, the reality is that the process is not simple or quick. Local governments know the needs, goals and limitations of their individual jurisdictions and regions, and must remain empowered to implement programs that best meet their unique situations. Diminishing land use authority would detract from the ability of local governments to meet those local goals and needs, and would in all likelihood stymie rather than facilitate Blueprint development.

##### The State should provide incentives, not penalties

The Scoping Plan recognizes that many cities, such as Roseville, are progressive and already moving in the direction of AB 32 compliance. The Scoping Plan identifies "Community Design" as an area for which local governments must account for environmental impacts associated with project siting and design. While local governments can influence development design to a certain extent, the reality is that developers will only build projects that will be purchased by willing customers and that are profitable. In order to effect the desired change, incentives must be provided to the development community. Moreover, it is impractical to suggest that levying fees on new development or utilities will achieve the desired ends, as it would drive up the cost of development, and be a disincentive to investments in innovative design.

##### Regional targets should be flexible

There are a multitude of forces to which local governments must respond in their own ways. These include the Regional Housing Needs Allocation (RHNA) requirements, the extent of greenfield opportunities and build out in each community, the pace of new development as dictated by the economy, and many other factors. The City of Roseville is not opposed to the proposed concept of a regional target; however we are concerned about the potential implications if regions are unable to meet targets should they be made mandatory. Mandatory targets do not recognize the variability of conditions among local jurisdictions and should not be required as part of the Scoping Plan.

The City's programs illustrate the success of the incentive-based approach. The City's recent "Cash for Grass" program, to help property owners convert from grass to a water-efficient landscape, demonstrated the overwhelming public interest and desire for these programs; there was not adequate funding to meet the demand.

Infrastructure funding must be provided

The Scoping Plan does not identify a funding source to provide for the recommended "increased emphasis on urban infill development." This is essential for local governments given the infrastructure costs often associated with redevelopment projects. Infill and redevelopment projects could also provide opportunities for development-oriented incentives such as relief from CEQA mitigation requirements, exemption from state agency review fees, shortened comment periods, etc.

Thank you again for the opportunity to submit these comments for the public record. If you have any questions, or would like additional information about actions being taken in the City of Roseville, please do not hesitate to contact Terri Shirhall, in the Planning and Redevelopment Department, at (916) 774-5422.

Sincerely,

Jim Gray  
Mayor

Attachment: [www.arb.ca.gov/lists/sp-general-ws/489-rv\\_sustainability\\_initiatives\\_report\\_2007.pdf](http://www.arb.ca.gov/lists/sp-general-ws/489-rv_sustainability_initiatives_report_2007.pdf)

Original File Name: RV Sustainability Initiatives Report 2007.pdf

Date and Time Comment Was Submitted: 2008-08-07 10:44:48

No Duplicates.

**Comment 261 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gretchen

Last Name: Hardison

Email Address: gretchen.hardison@lacity.org

Affiliation:

Subject: City of Los Angeles Comments on the Draft AB32 Scoping Plan

Comment:

The attached file contains the City of Los Angeles comments on the  
draft AB32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/491-comments\\_draft\\_ab32\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/491-comments_draft_ab32_scoping_plan.pdf)

Original File Name: Comments Draft AB32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-07 13:46:37

No Duplicates.

**Comment 262 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Norman  
Last Name: Plotkin  
Email Address: norm@pzallc.com  
Affiliation:

Subject: Draft Scoping Plan  
Comment:

The following comments were received by OCC on August 4th:

Please find attached comments of the California Independent  
Petroleum  
Association (CIPA) regarding both the Draft Scoping  
Plan/Appendices and Oil  
and Gas Subsector of the Industry Sector. CIPA appreciates the  
opportunity  
to submit these comments and is happy to address any questions.

Norman Plotkin  
Plotkin Zins & Associates  
925 L Street, Suite 1490  
Sacramento, CA 95814  
916.446.5900  
916.781.3903

Attachment: [www.arb.ca.gov/lists/sp-general-ws/492-  
cipa\\_comments\\_to\\_carb\\_on\\_draft\\_scoping\\_plan\\_8-4-08.doc](http://www.arb.ca.gov/lists/sp-general-ws/492-cipa_comments_to_carb_on_draft_scoping_plan_8-4-08.doc)

Original File Name: CIPA Comments to CARB on Draft Scoping Plan 8-4-08.doc

Date and Time Comment Was Submitted: 2008-08-07 13:54:29

No Duplicates.

**Comment 263 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Danila

Last Name: Oder

Email Address: dodder@usc.edu

Affiliation:

Subject: Agriculture

Comment:

The global warming contributions of livestock are not limited to the methane they produce. The effect of trampling on soils' ability to capture carbon is not yet clear (see <http://www.biologicaldiversity.org/news/center/articles/science-07-13-2008.html>), but the attached article (Teepe) suggests intact soils capture carbon better than trampled soils.

For this reason, CARB should follow this issue and look into eliminating livestock grazing from state public lands.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/493-teepe\\_et\\_al.pdf](http://www.arb.ca.gov/lists/sp-general-ws/493-teepe_et_al.pdf)

Original File Name: teepe et al.pdf

Date and Time Comment Was Submitted: 2008-08-07 16:06:22

No Duplicates.

**Comment 264 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lisa

Last Name: Novotny

Email Address: lnovotny@lakewoodcity.org

Affiliation: City of Lakewood, CA

Subject: City of Lakewood comments on draft scoping plan

Comment:

Please refer to the attached document for the city of Lakewood's  
comments on the draft scoping plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/494-lakewood\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/494-lakewood_scoping_plan_comments.pdf)

Original File Name: Lakewood scoping plan comments.pdf

Date and Time Comment Was Submitted: 2008-08-07 17:02:31

No Duplicates.

**Comment 265 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kyra

Last Name: Ross

Email Address: mmckelvey@cacities.org

Affiliation: League of California Cities

Subject: League of California Cities Comments on Climate Change Draft Scoping Plan  
Comment:

Attached are the League of California Cities official comments on  
the ARB Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/495-  
scoping\\_plan\\_comment\\_letter\\_8aug08\\_final\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/495-scoping_plan_comment_letter_8aug08_final__2_.pdf)

Original File Name: Scoping Plan Comment Letter 8aug08 FINAL \_2\_.pdf

Date and Time Comment Was Submitted: 2008-08-08 09:43:12

No Duplicates.

**Comment 266 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Yvette

Last Name: Rincon

Email Address: yrincon@cityofsacramento.org

Affiliation: City of Sacramento

Subject: City of Sacramento Comments on Local Govt Appendices Section

Comment:

Please find attached the City of Sacramento's comments on the Local Government section of the appendices. We will submit comments on other sections before the October 2, 2008 deadline.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/496-ab\\_32\\_appendices\\_city\\_of\\_sac\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/496-ab_32_appendices_city_of_sac_comments.pdf)

Original File Name: AB 32 Appendices City of Sac Comments.pdf

Date and Time Comment Was Submitted: 2008-08-08 11:47:04

No Duplicates.

**Comment 267 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

Subject: How would you like your climate allocation: Dividend, Tax Credit, or Share?  
Comment:

Dear ARB,

Please see the attached file on the subjects of:

- How to spend the revenues from an auction
  - Two types of consumer compensation
  - Carbon Share
- and
- How would you like your climate allocation: Dividend, Tax Credit, or Share?

Background information is available at [www.carbonshare.org](http://www.carbonshare.org).

Sincerely,

Mike Sandler

Attachment: [www.arb.ca.gov/lists/sp-general-ws/497-forgov8-8-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/497-forgov8-8-08.pdf)

Original File Name: forgov8-8-08.pdf

Date and Time Comment Was Submitted: 2008-08-08 13:05:32

No Duplicates.

**Comment 268 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jill  
Last Name: Whynot  
Email Address: [jwhynot@aqmd.gov](mailto:jwhynot@aqmd.gov)  
Affiliation: SCAQMD

Subject: SCAQMD Staff Comments on Draft Scoping Plan  
Comment:

Attached are comments provided by South Coast Air Quality  
Management District staff.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/498-jamesgoldstene\\_brw\\_080808.doc](http://www.arb.ca.gov/lists/sp-general-ws/498-jamesgoldstene_brw_080808.doc)

Original File Name: JamesGoldstene BRW 080808.doc

Date and Time Comment Was Submitted: 2008-08-08 13:25:52

No Duplicates.

## **Comment 269 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Kristopher  
Last Name: Collingsworth  
Email Address: surfingmkc@aol.com  
Affiliation:

Subject: Where is John Galt?

Comment:

CARB and the short-sighted lemmings who think this is a good idea are going to be wondering who will be left as the producers of good and services in this great state.

The day is near when those politicians in their ivory towers will have to exit their buildings and wonder where has the tax revenue for California gone?

If you people think the debate is over on man made global warming, you had better get ready for a shock of your lives... even the most dubious of politicians and public policy makers cannot refute the empirical data that is continuing to show the earth is now in a cooling phase. But, hey, go ahead and fool yourselves so you sleep better at night thinking you have saved the world from itself. In fact, I hope you sleep well tonight because you will soon become insomniacs wondering, "what the hell did we do?"

Not even John Galt can save you fools from yourself now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-08 15:19:42

No Duplicates.

## **Comment 270 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Marc

Last Name: Fontana

Email Address: marcf4u@yahoo.com

Affiliation:

Subject: Land Use Should be addressed to reduce CO2

Comment:

Thank You CARB for the opportunity to attend your AB-32 Draft Scoping Plan workshop today and for the great job on creating the draft plan.

I have the following comments:

\* I agree with many of the speakers who said that Land Use is a vital area that should be addressed in the plan. My suggestion is that local governments should be required to submit an anticipated Green House Gases environmental impact report for any new large development project and not exceed CARB limits before they can proceed with development.

\* I would like to see some specific language that commits communities to include their plans for bicycle and pedestrian traffic as well as accessibility to Mass transit from all parts of the community.

\* I'm a supporter of subsidizing ZEVs and PHEVs via fee reductions or rebates to encourage the adoption of clean vehicles.

\* The State should strongly encourage and promote the installation of Solar Thermal water and space heating in businesses and residences. This investment has a potential of a faster return on investment than PV. It should also continue to support and encourage Solar PV installation for homes and businesses.

\* No Nukes Please ! I don't care how revolutionary the latest nuclear technology is, if it produces radio active waste, has the potential for a disaster and requires a lot of water, it's too risky. Safer and more renewable alternatives exists today which can meet our needs. We don't need Nuclear to meet our targets.

Sincerely,

Marc Fontana

Attachment:

Original File Name:

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

No Duplicates.

**Comment 271 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Julie

Last Name: Rynerson Rock

Email Address: jrynersonrock@lusd.sbcounty.gov

Affiliation: San Bernardino County

Subject: CARB Climate Change Draft Scoping Plan

Comment:

See attached comment letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/501-sbco\\_comment\\_ltr\\_draft\\_arbscoping\\_plan\\_final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/501-sbco_comment_ltr_draft_arbscoping_plan_final.pdf)

Original File Name: SBCo\_Comment Ltr\_Draft ARBScoping Plan\_Final.pdf

Date and Time Comment Was Submitted: 2008-08-08 17:22:09

No Duplicates.

## **Comment 272 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Irvin

Last Name: Dawid

Email Address: irvindawid@hotmail.com

Affiliation:

Subject: I attended SJ hearing, 8/8/08

Comment:

Here are my writtten comments (to supplement what I stated in San Jose)

Thank you for doing this outreach as well as for drafting this scoping plan to reduce global warming here in CA.

My concerns lie with the Land Use AND Cap & Trade or California Carbon Trust parts of the plan:

- Land Use - Jerry Hill mentioned yesterday's SF Chronicle editorial, "The Planning Void" (<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2008/08/07/EDC61267N3.DTL>) which indicated that reductions of only a "scant 2 million metric tons through better land use decisions (will be achieved in the current draft)...Incredibly, that would be less than the (reductions that the) air board plans to achieve from encouraging proper tire inflation."
  - The editorial described SB 375, a regional land use and transportation bill that allows ARB to set reduction targets. I believe that bill has the potential to do to land use, transportation, and regional planning what AB 32 itself has done to climate change.
    - o I had attended the Land Use Sub-Group Action Team workshop in Oakland, convened by the Energy Commission and ARB, and I was very encouraged - I learned a lot as well!
- I was highly impressed by one particular slide using the 3-legged stool metaphor for achieving GHG reductions in transportation:
- More fuel efficient vehicles, e.g. Pavley
  - Low carbon fuel standard
  - Land use and transportation improvements that result in reduced VMT - and that was mentioned to be the 'weakest' of the 3 legs and it shows! This 'leg' needs strengthening!

Many preceding speakers also spoke to strengthening the land use element, including neighborhood amenities like small grocery stores to walk to. However, that means providing the consumer base to make them survive financially, and that means adding density to existing neighborhoods, which is very controversial, especially but not solely in affluent communities. While "all land use is local" prevails in our state, if we are to get people out of their cars so as to reduce GHG emissions, ARB is going to have to consider this problem.

Hopefully SB 375 will be the key to tackling this challenge!

Moving on to:

- Cap & Trade or California Carbon Trust:
  - o Clearly the fact that carbon is currently 'unpriced' is a major, if not the major cause of global warming.
  - o I would like to see the alternative of a carbon tax considered. This then brings up the issue of where to apply the carbon revenues.
  
- I would like to see what NASA's Jim Hansen calls a 'carbon tax and 100% dividend' ([http://www.columbia.edu/~jehl/mailings/20080604\\_TaxAndDividend.pdf](http://www.columbia.edu/~jehl/mailings/20080604_TaxAndDividend.pdf)), similar to the Cap & Dividend mentioned earlier, considered where the carbon tax is returned to all California residents in the form of a carbon dividend deposited directly into their bank accounts - sort of like the Alaska Permanent Fund in reverse. Alaska shares all oil and gas revenues with its citizens. A carbon dividend would reward citizens who use less fossil fuels because they would spend less in carbon taxes...while all citizens would receive the same dividend.
  
- Many preceding speakers repeated, "We should be making polluters pay", presumably referring to Big Oil, the Hansen Cement Plant, the power generators, Big Agriculture.
  - o I prefer to use the line, "Make consumers pay"....For example, to just look at two areas where consumers would be accountable:
    - to be accountable for my transportation choices:
      - The vehicle I drive
      - How much I drive
      - How fast I drive
      - The fuel I use.
    - To be accountable for my housing choices
      - Where I live, which often determines how much I must drive
      - How much energy I consume in my house

To sum up, strengthen the land use component, greater emphasis on reducing vehicle miles traveled; consider other options to cap & trade that price carbon but are more 'seamless', that make the costs evident and less elusory and easy to avoid.

Finally, consumers, as well as polluters, need to be held accountable for our choices.

Thanks for coming to San Jose today! Obviously you know the way:-)!  
.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-08 18:27:27

No Duplicates.

## **Comment 273 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Steve  
Last Name: Kirsch  
Email Address: stk@propel.com  
Affiliation:

Subject: Incentivize utilities to build an IFR nuclear reactor  
Comment:

The only way to stop climate change is to eliminate coal.

the only way to do that is to prove you can build a power plant  
that is cheaper than a coal plant, but with zero emissions.

the only thing that does that is the IFR which was scuttled in  
1994 by Clinton who called it unnecessary.

James Hansen just found out about it and he thinks it is extremely  
promising.

GE has a commercial design called the S-PRISM that is ready to be  
built.

We should build one in California and show the world out of this  
mess.

See

<http://www.skirsch.com/politics/globalwarming/ifr.htm>

It's an amazing story of government foresight and stupidity.

California can't solve the climate crisis alone. The draft plan  
does nothing to show the world how to replace coal plants. That's  
critical. otherwise we win the battle in california, but lose the  
war. This is one war we cannot lose.

Please read the link.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-08 18:59:02

No Duplicates.

**Comment 274 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Margaret  
Last Name: Grolle  
Email Address: grolle@juno.com  
Affiliation:

Subject: AB 32  
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: 2008-08-09 16:14:22

No Duplicates.

## **Comment 275 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Chris

Last Name: Bellizzi

Email Address: Chris13b@ix.netcom.com

Affiliation: Bellizzi Tree Service

Subject: Draft Scoping Plan

Comment:

Good Morning Members of CARB, (I WAS SPEAKER #62 but could not stay)

I participate in these proceedings 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 petroleum 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 first 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 output is about 10,000 pound per year about 1/4 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. Please allow high efficiency Bio-Diesel vehicles to thrive in state of California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-09 18:42:27

No Duplicates.

## **Comment 276 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Sandra

Last Name: Skolnik

Email Address: skolniks@pacbell.net

Affiliation:

Subject: Not far enough

Comment:

When is enough enough? Business comes first and the heck with people? While each sector of our society has its own best interests in mind, the issue is the well being and health of all of its citizens as well as the environment we live in.

The climate issues and global repercussions are serious and have been confirmed by experts in the fields, as well as manifested in our environment - it is not up to business persons to claim whether there is or is not global warming, and it is not up to the state to constantly appease business. It would seem that we need to be more aggressive in the steps and timetable it will take to reduce human affects on the environment. While we are projecting out 12-42 years, the environment continues to deteriorate - compounding the problem. The environment waits for noone - government, lawyers or business.

The plan needs to be strengthened and expanded. Polluters should pay - it is not a 'right' to do business in California - it should be considered a privilege. Businesses that practice good social and environmental practices should be rewarded and those that don't should be penalized. I agree that California workers should be trained in new technologies. Polluting companies that use the argument that they will create new jobs to justify continue unneeded development and tax breaks is a manipulative trick - who are new jobs being created for? Californianans? Or will it create the need to import more workers, develop more precious land and create continuing overpopulation which will compound the problems we already have?

Maximum tax credits should be given to energy efficient research and consumer purchases, including cars, appliances. The oil industry should not receive public welfare, while alternative energy research goes begging for money.

Finally, I do not see provisions for preservation and protection of natural resources and wildlife that depends on them. How will this plan address the need for financial support of our parks and natural resources?

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-10 14:21:08

No Duplicates.

**Comment 277 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: DR ANN  
Last Name: DUNCAN  
Email Address: aduncan701@yahoo.com  
Affiliation:

Subject: CLEAN UP THE AIR  
Comment:

I am a victim of dirty air and dangerous particulates in the air in Los Angeles. My doctor has diagnosed me with silicosis, bronchiectasis, and pseudomonas. No one can pin point its origin other than to say it is in the air. My immune system is compromised and I am subject to bronchitis many times a year due to a weakened immune system.

I urge the California Air Resources Board to include a stronger focus on measures to reduce emissions from driving that contribute the largest percentage of greenhouse gases in California. The plan should include a much more aggressive statewide goal for reducing vehicle trips and measures to promote progressive action by local governments. The plan should also include additional strong regulatory measures on industrial sources to reduce emissions from petroleum refineries, power plants, cement manufacturers, and others sources.

It is vitally important the plan demonstrate that the variety of proposed measures will not only make rapid progress toward reducing greenhouse gases, but will also provide local benefits to communities in terms of improved air quality and public health.

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

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-10 14:36:34

No Duplicates.

## **Comment 278 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Nicole

Last Name: Smith

Email Address: nsmith@lgpatlaw.com

Affiliation: IP Attorney & Concerned Consumer

Subject: Clean Energy for Grid & Transportation

Comment:

Dear CARB:

Thank you for the time and effort put into the Draft AB 32 Scoping Plan. Your efforts put California on the forefront of dealing with the major problems of energy and climate change plaguing us today. Certainly, it is no easy task to create a solution when so little is known about the efficacy, efficiency and long-term viability of possible solutions.

Clean Energy Sources for the Grid: Examine Wind Energy

Currently, the draft scoping plan is vague in terms of which clean energy solutions CARB will pursue. Perhaps this is for political reasons or perhaps the scoping plan is vague because not much is known about how clean energy solutions compare to each other with respect to power capacity, environmental impact, reliability, and national security.

There are many possible solutions being promoted in today's marketplace, not all of which have realistic, long-term viability.

For this reason, I urge CARB to closely review unbiased research currently being done in universities in California and across the country. For example, Stanford's Atmosphere/Energy program in the school of Civil & Environmental Engineering is comparing various clean energies in search of energy solutions that are efficient, safe and have long-term viability.

Wind energy, though long treated as a fringe energy source, is emerging as the most powerful and efficient clean energy source available. Wind turbines harvest electrical energy that is exponentially greater than the velocity of the wind. Consequently wind energy is an "underdog" power solution that warrants further investigation and incentives.

Clean Energy for Transportation: Electric Vehicles

As you know, transportation is the largest single contributor to California's carbon emissions, accounting for circa 40% of the state's emissions. Carbon emissions are reduced by cars using electricity, such as the hybrid gas-electric vehicles. Carbon emissions are reduced further by vehicles using a plug in, hybrid, gas - electric system. Carbon emissions are eliminated completely by all electric vehicles, such as the Tesla and the electric vehicles produced almost a decade ago.

Currently, no new all-electric cars are on the market for less than \$100,000. I urge you to create corporate and consumer incentives for all-electric vehicles and plug in hybrids enabling more consumers to afford electric vehicles and promoting the production of more electric vehicles.

Thank you for your time and effort in tackling the major problems facing us today. It is my sincere hope that CARB is not swayed by lobbyists promoting corporate causes but instead intertwines itself with solutions and research conducted by unbiased sources pointing CARB towards efficient, long-term energy solutions.

I wish you all the best of luck and wisdom as your actions will have lasting impact.

Sincerely,  
Nicole Smith

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-10 21:20:25

No Duplicates.

## **Comment 279 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Cynthia

Last Name: van Empel

Email Address: cvanempel@gmail.com

Affiliation:

Subject: Land use and transportation, agriculture, cap and trade

Comment:

Thank you for the opportunity to comment on the Draft Scoping Plan and its appendices. A great deal of effort and expertise have been expended to develop this plan in such a short period of time.

I have been a land use, transportation, and environmental planner for over 20 years and have watched the debate over climate change during that time with great interest. It has now become imperative that influential governments, such as California, take decisive action.

Business as usual for the last 60 years has created today's problems in California. Business as usual has resulted in poor and declining air quality in an increasing number of air basins. Although strides have been made toward better air quality in California, the price has been paid almost exclusively by stationary sources: industries such as architectural coatings, furniture manufacturing, and agriculture. Significantly, it has been California's inability to establish controls on vehicle emission standards and development practices that has prevented the achievement of federal and state air quality standards, resulting in significant public health costs and premature deaths for thousands of Californians. Government regulations have proven over the years the only meaningful way to make significant progress toward achieving important public goals. Literally nothing is more important than reducing greenhouse gas emissions and I urge you to require compact, automobile-independent development to speed the state toward achieving the worthy goals of AB 32.

As California's population rises from 35 million in 2000 to 55 million in 2000, approximately 33 percent of the new growth in California is expected to occur in the San Joaquin Valley. The Department of Finance projects the population of the San Joaquin Valley to grow from 3.3 million in 2000 to 5.3 million in 2020 to 9.4 million in 2050. The San Joaquin Valley has an ample supply of valuable farmland that serves as a reservoir of cheap land for automobile-dependent suburban sprawl.

The target of a two percent reduction in greenhouse gas emissions due to "business-as-usual" development patterns is far too low. My own calculations indicate that a target reduction in greenhouse gas emissions from land use-transportation of more than 11 percent for the San Joaquin Valley and more than 5 percent for the rest of the state are achievable by 2020 by simply requiring (1) infill development (2) in locations planned for more intensive "alternative" transportation: bus, rail, bicycling, and walking. Using this strategy, the improvements would be significantly higher

in 2050.

Reducing emissions from residential development does not involve new or special technologies, but simply requires changing the product type offered and its location. This is not an unknown technology: there are thousands of examples, both new and old, of urban development and housing product types that support non-automobile transportation.

The cap-and-trade strategy is commonly used in situations where pollution reduction occurs via new technologies and only a small number of regulated parties are initially able to take advantage of the new technologies, allowing trading. This is inherently unfair, since California has consistently required industry and agriculture to reduce air pollution emissions over the years, while requiring no changes in transportation and development patterns, an enormous potential source of emission reductions.

Which brings me to another point: the draft scoping plan failed to account for the transportation of foodstuffs into California to replace food that would have been grown on agricultural land that was converted to agricultural uses. California has recently become a net importer of food, the transport of which results in greenhouse gas emissions and increased food costs to Californians, while also undermining California's economy. The more agricultural land that is allowed to convert to urban or suburban development, the greater greenhouse gas emissions result from food transportation and the greater the drain on personal income and the state economy--and the greater the loss of carbon sequestration potential from agricultural soils and products. Eliminating greenfield development and maintaining the current supply of agricultural land will reduce the distance food must travel to market, reducing greenhouse gas emissions and food costs, while preserving an important sector of the economy. It is not insignificant that California's demand for agricultural products increases concomitantly with the population, so the state can ill afford to allow the continued conversion of agricultural land to houses.

I believe that the carbon fee strategy (page 41) imposes an unfair burden on the citizenry after encouraging--or at least not discouraging--private interests to build in a manner that inherently results in high greenhouse gas emissions. The proposal allows land developers to continue business as usual, consuming large quantities of agricultural land to create automobile-dependent developments, then to penalize the people who buy into these automobile-dependent developments by charging them carbon fees for behaving the only way they can in their automobile-dependent developments. It is fairer and more sensible to require development to occur in a manner that fully supports alternative transportation and then penalizes with carbon fees individuals who opt not to use alternative modes of transportation that are now convenient due to the low-energy (non-automobile-dependent) development pattern in which they live.

To support the necessary sea-change in transportation and land development and to make the most effective use of dwindling public infrastructure dollars, California should cease funding transportation projects that increase roadway capacity for automobile travel and aggressively move toward funding rail transportation (freight and passenger), bus travel, and bicycle

facilities, while maintaining the state's current roadway facilities for personal automobiles.

I believe that any voluntary measures to reduce greenhouse gas emissions should receive zero emissions credit. Reducing greenhouse gas emissions will require substantial changes in the way we live and only a small number of Californians are likely to change voluntarily. In order to create incentives for change, the state will need to fund transportation and energy alternatives that are simply more attractive than continuing to live the way we do today. Once Californians see that their alternative future is not so scary, but creates many new, attractive alternatives to contemporary living, people will be more willing to change their current lifestyles to a less energy-intensive lifestyle.

The Draft Scoping Plan assumes an expansion of the state's renewable energy portfolio to 33 percent and also depends upon the use of "low-carbon fuels" to achieve greenhouse gas emission reductions in the transportation sector. This strategy fails to account for the likely shift away from petroleum-based fuels for transportation as supplies dwindle and prices increase and toward electricity or other alternative fuel sources, thus overestimating the transportation sector GHG reductions from "low-carbon fuels" and underestimating the need for renewable energy sources. I recommend aggressively pursuing research and development of alternative, renewable energy sources, while creating a significantly more compact development pattern, which will position California as a world leader in energy technology, while reducing California's consumption of energy.

Cindy van Empel, M.A., AICP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-11 10:39:31

No Duplicates.

## **Comment 280 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Jim  
Last Name: Wunderman  
Email Address: lstraub@bayareacouncil.org  
Affiliation: Bay Area Council

Subject: Bay Area Council Encourages CARB to Adopt SB 375  
Comment:

August 7, 2008

Ms. Mary Nichols  
Chair, California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Draft Climate Change Scoping Plan

Dear Ms. Nichols:

The Bay Area Council applauds the work the Air Resources Board has done to date in steering the state towards meeting the goals laid out in AB 32. We are particularly supportive of your recommendation for a comprehensive cap and trade program and we hope that business can lead in the development of innovative approaches to make this system work.

We have concerns however that that Climate Change Draft Scoping Plan does not sufficiently address one major piece of the puzzle, that being more efficient land use.

As co-signators, with the Urban Land Institute (ULI), of California 2020 Responsible Land Use: A Path to a Sustainable California by 2020, we feel strongly that if we are to meet the ambitious AB 32 greenhouse gas reduction targets, especially those set for 2050, we need to immediately begin addressing the inefficient land use patterns which have forced so many Californians into automobiles and onto our freeways. While The Draft Scoping Plan lays out a clear strategy on how to reduce the carbon impact of those drivers through cleaner fuels and better mass transit options it does little to address how we can change those transportation patterns and reduce vehicle miles travelled (VMT) through better, more efficient land use.

We have also been working with Senator Darrell Steinberg for over two years on ensuring that California 2020 principles are incorporated in SB 375 and we are very pleased that the cities, the environmental community and the home builders have now reached agreement on how to develop California in a smart and sustainable manner going forward.

We have developed a horizontal suburban state with large housing subdivisions linked by large freeways to distant job centers and services traversed by people in large SUVs. We feel that while it

is important to address that large SUV and its emissions, it is equally, if not more important to address the land use patterns that are at the core of this problem. As our overall VMT grows, new technology will not be able to keep pace with the emissions produced by all those additional miles travelled. We need to get people out of their cars and if they do have to drive we need to reduce the length of those trips. This can only be achieved by developing a regional planning focus and altering our land use behavior.

A study in the Bay Area by the Metropolitan Transportation Commission found that for people who both live and work within half a mile of a rail or ferry stop, 42 percent of them commute by transit. For those who neither work nor live within such proximity, the number falls to 4 percent. Elsewhere, individuals living in higher-density neighborhoods that include convenient access to transit, as well as pedestrian and bicycle-friendly features, reduce their driving by 15 to 50 percent.

We need to incentivize and facilitate Transit Oriented Development, as well as remove barriers and impediments to urban infill development where homes are built close to retail, services and jobs. We need to develop a plan that will reduce VMT by building dense multi-family housing closer to services and jobs, and we need to focus on getting people out of cars.

We would like to suggest that the Bay Area region be put forward for a regional pilot program on how best to reduce VMT through better land use and more efficient transit alternatives. The Bay Area is the ideal place for such a program since we have an abundance of urban infill and TOD opportunities and the political and popular will is here to see the necessary changes made in order to reduce greenhouse gas emissions.

It can take decades to effect meaningful land use changes therefore we encourage you to adopt the policies laid out in California 2020 and SB 375 and address this issue as soon as possible. We look forward to working with you to make California a cleaner healthier place for all its citizens. The official letter is attached.

Sincerely,

Jim Wunderman  
President & CEO  
Bay Area Council

Cc: Members, California Air Resources Board  
Metropolitan transportation Commission  
Association of Bay Area Governments  
Bay Conservation and Development Commission

Attachment: [www.arb.ca.gov/lists/sp-general-ws/512-carb\\_letter\\_\\_3\\_.doc](http://www.arb.ca.gov/lists/sp-general-ws/512-carb_letter__3_.doc)

Original File Name: CARB letter (3).doc

Date and Time Comment Was Submitted: 2008-08-11 12:08:40

No Duplicates.

**Comment 281 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David

Last Name: Haines

Email Address: david.e.haines@shell.com

Affiliation:

Subject: Shell Exploration & Production submission AB 32 Draft Scoping Plan

Comment:

Please find attached a submission that addresses our concerns related to the lack of language regarding Carbon Capture & Storage (CCS).

Thank you for your attention to this attachment.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/513-shell\\_exploration\\_\\_\\_production.pdf](http://www.arb.ca.gov/lists/sp-general-ws/513-shell_exploration___production.pdf)

Original File Name: Shell Exploration & Production.pdf

Date and Time Comment Was Submitted: 2008-08-11 12:48:34

No Duplicates.

## **Comment 282 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Val

Last Name: Sanfilippo

Email Address: sanfiv@yahoo.com

Affiliation:

Subject: Make SDGE install residential solar roofs for local power

Comment:

Talking Points for Global Warming Scoping Plan Hearings

I want to thank CARB for producing the nation's most comprehensive plan to date for reducing the pollution that causes global warming. However, I urge CARB to strengthen parts of the plan that are weak.

The scoping plan recommends that a third of our electricity come from renewable sources like wind and solar by 2020. I strongly urge you to keep this vital component in the final plan. (Click here for more information on the renewable electricity standard.)

The scoping plan recommends that CARB consider a "Clean Car Discount" program (sometimes called a "feebates" program), for reducing global warming pollution from cars and trucks. Instead of just considering a Clean Car Discount, CARB should recommend implementing a Clean Car Discount program as one important part of the solution to reduce global warming pollution from our cars and trucks. (Click here for more information on the "Clean Car Discount" or feebates program.)

While the scoping plan includes a cap and trade program—a market based plan to limit global warming pollution—it is currently far too lenient. For instance, it allows 100 percent of the emission reductions to come from offsets, so instead of reducing their own pollution, polluters can just meet the requirements by paying for pollution-reducing projects elsewhere. The use of offsets for compliance in a cap and trade system must be carefully limited to a very small fraction of required reductions. Offsets should never be used to comply with direct regulations, like the renewable energy or clean car standards. (Click here for more information on the cap and trade program.)

The state's global warming plan should deter pollution and reward clean energy. A cap on pollution must require polluters to pay for their "allowances" based on how much they pollute, so that we can level the playing field and encourage cleaner sources of energy. Allowances should not be given away for free. (Click here for more information on cap and trade allowances.)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-11 13:19:41

No Duplicates.

**Comment 283 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Patrick

Last Name: Griffith

Email Address: pgriffith@lacsds.org

Affiliation:

Subject: CORRECTED - LACSD Comments on ARB's Scoping Plan

Comment:

Please refer to these comments in lieu of those submitted by our agency on August 1, 2008. This submittal is the CORRECTED version edited to remove typos and improve the clarity of our suggestions.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/516-corrected\\_lacsds\\_comments\\_on\\_arb\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/516-corrected_lacsds_comments_on_arb_scoping_plan.pdf)

Original File Name: Corrected\_LACSD\_Comments\_on\_ARB\_Scoping\_Plan.pdf

Date and Time Comment Was Submitted: 2008-08-11 13:45:01

No Duplicates.

## **Comment 284 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Patrick

Last Name: Griffith

Email Address: pgriffith@lacsds.org

Affiliation:

Subject: GENERAL comments on the ARB Scoping Plan

Comment:

These comments from our overall letter speak to our general concerns on the Scoping Plan:

1. It appears that the 111th Congress will pass some type of climate change program modeled perhaps after the proposals of Senators Boxer-Lieberman-Warner and/or Representative Edward Markey. We strongly believe that CARB must take affirmative steps in Washington and insert itself into the legislative process to assure that our early actions here in California will be protected or that our program here will be deemed equivalent. It would be a significant disadvantage to California if the starting point of a federal program were drawn such that California business would have to re-reduce their GHG emissions. One area (of many) that CARB should focus on in Washington is to make sure that any bill that does work its way through Congress has sufficient free allocations assigned to early action programs contained in State programs.

2. The California GHG regulatory program should be considered a transitional program and should be designed to fit into an eventual federal GHG program that can reasonably be expected to have allocations, auctions, credits and offsets.

3. 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.

4. The yet-to-be released Environmental Impacts appendix should be expanded to serve as the CEQA document for GHGs for the entire program as laid out by the Scoping Plan. It is not productive for local governments, for instance, to re-hash arguments in favor of a project that is implementing a measure contained in the Scoping Plan when CARB, better than anyone else, understands the big picture and how the specific action fits into the scheme of things. CARB should weigh in on behalf of the local government in

defending actions with all state agencies that are consistent with the Scoping Plan as part of the obligations imposed by the legislature as a result of AB 32. If an outright Categorical Exemption cannot be negotiated by CARB, then any actions consistent with the Scoping Plan and requiring environmental documentation could rely upon the documentation prepared for the Scoping Plan to satisfy at least the GHG portion or aspect of the associated project EIR. CARB should prevail upon OPR and the RA that compliance with the Scoping Plan covers a project's GHG issues, if any, under CEQA.

5. Local governments will need ARB assistance implementing many of the Scoping Plan proposals, as many of them will be controversial and unpopular with constituents. The public may not fully understand or appreciate the nexus between the proposed projects and its GHG benefits. Frequently there is community opposition to such projects as waste-to-energy or high density, mixed-use infill projects, for example. CARB needs to allocate resources to partner with the local governments that are making good faith attempts to implement the goals and objectives of the Scoping Plan.

6. ARB should consider an escape clause if things under the Scoping Plan simply become too expensive or cumbersome for Californians. The escape clause should be triggered by obvious indicators, such as the price of consumer goods. If the hurdles become too formidable, California needs to have the opportunity to re-visit the program to avoid voter backlash.

7. The Scoping Plan should contain a discussion of what will happen to California's program in the event of federal pre-emption.

8. Facility audits for the purpose of identifying criteria air pollutants and toxic air pollutants (C-103) is simply not appropriate in a GHG-targeted effort.

9. Estimates of co-benefits associated with a specific control measure are elusive. This is further complicated in that several air districts have already claimed as theirs any co-pollutants reduced as a result of state climate change strategies (see SCAQMD's 2007 AQMP Control Measure MOB-07 where co-benefits of fuel efficiency improvements and renewable energy sources accrue to the benefit of the SCAQMD). Co-benefit calculations in the footnotes in the cost estimates at the bottom of each control measure in the cases above is very likely zero.

10. 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.

11. ARB should referee the CAT state agencies as they implement their GHG plans to ensure that the Scoping Plan's over-arching

goals are accomplished and that agency carbon shadows are minimized. There is a real possibility that other state agencies in their zeal to charge ahead with GHG reduction programs may actually be exacerbating the conditions the Scoping Plan is attempting to control. Only time will tell in some of these situations. A good example would be in water resources, for example, if the SWRCB mandated a fixed percentage of water recycling to occur at each an every wastewater treatment plant in California. This mandate might not be appropriate at certain facilities where for a variety of reasons the GHG emissions associated with the recycling technology outweigh the emissions benefits of the produced water.

12. Reciprocating engine installation and operation in California as a result of various AQMPs and distributed generation legislation and regulations have all but removed this prime mover as a viable motive force in the South Coast. We urge the ARB not to insist upon across the board electrification as this will seriously impact California's ability to respond to emergencies such as earthquakes. Portable equipment will be needed to dig us out and stationary equipment will be needed in the event central utility plants and/or transmission lines are knocked out.

13. 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.

14. Permitting actions for projects that are consistent with the Scoping Plan should receive some form of streamlined processing or at the minimum, expedited processing, so that the project can get under construction as soon as possible.

15. Aside from a brief mention on pages 54 and 57 of the document that they will be considered in the final Scoping Plan, the draft Scoping Plan is essentially silent on small business impacts. The offering of incentives by utilities will not be a universal panacea as the businesses in question are so varied in nature. We think the most effective way to protect small businesses in California, the most potent job creating engine in the state, is to structure some type of free allocation program or provide funds from the sale of allocations for small business grants to purchase technology to comply the spirit of the Plan.

16. Introduction, Part A, Section 2, Pages 2-3: The text describing AB 32 should include HSC §§ 38560.5(e) and 38562(b)(9) directing the ARB to take into account the relative contribution of each source or source category. The text should also mention HSC §§ 38560.5(b) and 38562(c) directing the ARB to establish a market-based mechanism to effect the emissions reductions.

17. Introduction, Part A, Section 2, Page 3: The ARB should do more than issue a policy statement encouraging voluntary early actions. Thus far, there are scant assurances that these actions will be protected under the Scoping Plan. Providing emission reduction estimates of these actions could be a useful first step to promoting early reduction measures once people see their potential.

18. Introduction, Part A, Section 3, Page 4: The text mentions that the Climate Action Team Members submitted more than 100

greenhouse gas reduction measures in March 2008. Please make this available as an appendix.

19. Preliminary Recommendations, Section C, Boiler and Engine Efficiency, Page 40: The ARB should recognize, as the SCAQMD has in their Rule 1146, that there is often an inverse relationship between boiler efficiency and more stringent criteria pollutant emissions standards. ARB should recognize that a state-wide call for increased efficiency could bump up against criteria pollutant limitations in non-attainment areas; areas that probably contain the majority of the state's stationary sources. On Page 4-22 of the June 2008 Draft Environmental Assessment for Rule 1146 (boilers above 5 MMBTUH) the SCAQMD recognizes that the installation of ultra-low NOx burners decreases boiler efficiency, thereby increasing fuel use which in turn increases CO2 emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-11 13:53:47

No Duplicates.

**Comment 285 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 286 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ruth  
Last Name: McCormick  
Email Address: [rmccormick@bcse.org](mailto:rmccormick@bcse.org)  
Affiliation: Senior Policy Associate

Subject: BCSE Comments on Draft Scoping Plan  
Comment:

Attached please find the comments of the Business Council for Sustainable Energy on the California Scoping Plan. For questions or comments, please contact Ruth McCormick in the Council's offices at 202.785.0507 or by e-mail at [rmccormick@bcse.org](mailto:rmccormick@bcse.org).

Attachment: [www.arb.ca.gov/lists/sp-general-ws/519-bcse\\_\\_fnl\\_ca\\_ab32\\_8.11.08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/519-bcse__fnl_ca_ab32_8.11.08.pdf)

Original File Name: BCSE\_FNL\_CA AB32\_8.11.08.pdf

Date and Time Comment Was Submitted: 2008-08-11 14:48:49

No Duplicates.

**Comment 287 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Chris

Last Name: Carney

Email Address: cseghers@arb.ca.gov

Affiliation: Union of Concerned Scientists

Subject: AB 32 Scoping Plan

Comment:

Please see attached comments

Attachment: [www.arb.ca.gov/lists/sp-general-ws/520-8\\_1\\_08\\_unionofconcernedscientistsdisc.pdf](http://www.arb.ca.gov/lists/sp-general-ws/520-8_1_08_unionofconcernedscientistsdisc.pdf)

Original File Name: 8\_1\_08\_unionofconcernedscientistsdisc.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:06:45

No Duplicates.

**Comment 288 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michael T.  
Last Name: Meacham  
Email Address: cseghers@arb.ca.gov  
Affiliation: City of Chula Vista

Subject: AB 32 Scoping Plan  
Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/521-8\\_01\\_08\\_cityofchulavista.pdf](http://www.arb.ca.gov/lists/sp-general-ws/521-8_01_08_cityofchulavista.pdf)

Original File Name: 8\_01\_08\_cityofchulavista.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:08:44

No Duplicates.

**Comment 289 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Tiffany

Last Name: Rau

Email Address: Tiffany.Rau@hydrogenenergy.com

Affiliation: Hydrogen Energy International LLC

Subject: AB 32 Draft Scoping Plan – Comments on Carbon Capture and Storage

Comment:

On behalf of Hydrogen Energy International LLC, please accept the attached comments on the Climate Change Draft Scoping Plan, June 2008 Discussion Draft.

These comments will focus specifically on the role of carbon capture and storage (CCS) in enabling California to achieve the greenhouse gas emission reductions required by AB 32.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/522-hecommentsab32scopingplanaug1108.pdf](http://www.arb.ca.gov/lists/sp-general-ws/522-hecommentsab32scopingplanaug1108.pdf)

Original File Name: HECommentsAB32ScopingPlanAug1108.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:09:47

No Duplicates.

**Comment 290 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Taylor

Last Name: Miller

Email Address: TMiller@sempra.com

Affiliation:

Subject: Scoping Plan Appendices 8-11-08

Comment:

Sempra Energy Scoping Plan Appendices 8-11-08

Attachment: [www.arb.ca.gov/lists/sp-general-ws/523-secomments\\_8-11-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/523-secomments_8-11-08.pdf)

Original File Name: SEComments 8-11-08.pdf

Date and Time Comment Was Submitted: 2008-08-11 16:39:00

No Duplicates.

**Comment 291 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: Regional Council of Rural Counties

Subject: Comments on AB 32 Scoping Plan, June 2008 Discussion Draft and Appendices

Comment:

Attached please find RCRC's comments on the AB 32 Scoping Plan,  
June 2008 Discussion Draft and Appendices. Please contact me at  
916-447-4806 if you have any questions.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/524-slh.081108.ltr.draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/524-slh.081108.ltr.draft_scoping_plan.pdf)

Original File Name: slh.081108.ltr.Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-11 16:41:39

No Duplicates.

**Comment 292 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Art

Last Name: Leahy

Email Address: kessner@octa.net

Affiliation: Orange County Transportation Authority

Subject: OCTA Comments on the Draft Scoping Plan & Appendices

Comment:

Attached you will find the Orange County Transportation Authority's  
(OCTA)comments regarding the Draft Scoping Plan and Appendices.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/525-  
octa\\_draft\\_scoping\\_plan\\_\\_\\_appendices\\_comment\\_letter\\_\\_081108\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/525-octa_draft_scoping_plan___appendices_comment_letter__081108_.pdf)

Original File Name: OCTA Draft Scoping Plan & Appendices Comment Letter (081108).pdf

Date and Time Comment Was Submitted: 2008-08-11 16:44:39

No Duplicates.

**Comment 293 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Audrey  
Last Name: Chang  
Email Address: achang@nrdc.org  
Affiliation: NRDC

Subject: NRDC General Comments on Draft Scoping Plan  
Comment:

NRDC respectfully submits these non-sector-specific comments on the  
Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/526-  
nrdc\\_general\\_comments\\_on\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/526-nrdc_general_comments_on_draft_scoping_plan.pdf)

Original File Name: NRDC General Comments on Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-11 16:55:34

No Duplicates.

**Comment 294 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: William

Last Name: Rostov

Email Address: [wrostov@earthjustice.org](mailto:wrostov@earthjustice.org)

Affiliation: Earthjustice

Subject: Draft Scoping Plan and Appendices

Comment:

See attached letter. The three attachments to the letter will be sent by mail.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/527-final\\_draft\\_scoping\\_plan\\_letter\\_to\\_arb\\_for\\_cbd\\_wr\\_081108.pdf](http://www.arb.ca.gov/lists/sp-general-ws/527-final_draft_scoping_plan_letter_to_arb_for_cbd_wr_081108.pdf)

Original File Name: Final draft scoping plan letter to ARB for CBD wr 081108.pdf

Date and Time Comment Was Submitted: 2008-08-11 16:57:05

No Duplicates.

**Comment 295 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Melissa

Last Name: Mullarkey

Email Address: mmullarkey@recycled-energy.com

Affiliation: Recycled Energy Development, LLC

Subject: Climate Change Draft Scoping Plan, Pursuant to AB 32

Comment:

Comments to the Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/528-carb\\_dsp\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/528-carb_dsp_comments.pdf)

Original File Name: CARB DSP Comments.pdf

Date and Time Comment Was Submitted: 2008-08-11 17:34:32

No Duplicates.

## **Comment 296 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Richard  
Last Name: Dixon  
Email Address: chang@scag.ca.gov  
Affiliation: S. Cal Association of Governments

Subject: SCAG's Comments on Draft Scoping Plan  
Comment:

NOTE: The following letter from the Southern California Association of Governments (SCAG) President Richard Dixon was also mailed to the ARB.

August 11, 2008

Mary D. Nichols, Chairman  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Ms. Nichols:

On behalf of the Southern California Association of Governments, I am pleased to submit these preliminary comments on Climate Change Draft Scoping Plan. The Draft Scoping Plan begins to describe the tremendous challenge that has been given to your board under AB 32.

SCAG, as you know, is a Metropolitan Planning Organization (MPO) charged with preparing transportation, air quality, and other plans under various State and Federal laws. We are also a member organization comprised of 167 member cities and six counties in the Southern California region. We have been a partner with your agency in planning for clean air for nearly four decades.

We are encouraged that the Draft Scoping Plan recognizes the potential for regional planning and collaboration to achieve air emissions benefits. Of note, the Draft Scoping Plan proposes two million metric tons of CO<sub>2</sub> equivalent reductions to be achieved by local agencies through regional blueprint planning processes in 2020.

We recognize, however, that while the Draft Scoping Plan and Appendices lay out broad parameters under which regional targets for greenhouse gas (GHG) emissions reductions might work, there are many significant issues that would need to be fully addressed in order for our members to move this measure forward. Major examples include the appropriate level of the local government GHG reduction target (and any potential associated vehicle miles traveled reduction target), the technical methods to establish and verify emissions reductions, accountability measures, and commitment to incentives and funding for local participation.

Please note that a one-size-fit all approach may not be appropriate, and urge you to work with SCAG to further consider the breadth and complexity of the Southern California region, and to coordinate with us in your outreach to the variety of stakeholders here.

ARB staff has been accessible to SCAG staff, and I appreciate the willingness of your staff to work with us on discussing these issues. Nevertheless, I strongly encourage you to have additional focused discussions with MPOs around the State and with representatives of local governments.

Finally, please be aware that while we are submitting preliminary comments to respond to the August 11 deadline, we have not to date convened a full policy review and discussion involving SCAG's Regional Council. To that end, a Climate Change Workshop has been scheduled for September 4, 2008, the next meeting date of the SCAG Regional Council. It is our intention to submit further comments to you after the Workshop, but in advance of anticipated adoption of the Scoping Plan in November.

I am pleased that ARB will participate in the Climate Change Workshop discussion with the Regional Council when it meets on September 4. The Workshop will provide an opportunity for direct discussions with representatives of SCAG member cities and counties.

Thank you again for the opportunity to comment on the Draft Scoping Plan. We look forward to working with you on this important effort.

Should you have any questions regarding this letter, please contact Mr. Hasan Ikhata, Executive Director, at (213) 236-1944 for further information.

Sincerely,

RICHARD T. DIXON  
President  
Southern California Association of Governments

Attachment: [www.arb.ca.gov/lists/sp-general-ws/529-climate\\_change\\_-\\_scag\\_comments-081108.pdf](http://www.arb.ca.gov/lists/sp-general-ws/529-climate_change_-_scag_comments-081108.pdf)

Original File Name: Climate Change - SCAG Comments-081108.pdf

Date and Time Comment Was Submitted: 2008-08-11 17:50:47

No Duplicates.

**Comment 297 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Bob  
Last Name: Epstein  
Email Address: Bob@e2.org  
Affiliation: Environmental Entrepreneurs

Subject: E2's Comments on Draft Scoping Plan  
Comment:

To ARB,  
Thank for the opportunity to submit comments on the Draft Scoping  
Plan. Attached please find E2's comments.  
Respectfully,  
Diane Doucette  
E2

Attachment: [www.arb.ca.gov/lists/sp-general-ws/530-  
e2c2\\_comments\\_scoping\\_plan\\_draft\\_aug11.doc](http://www.arb.ca.gov/lists/sp-general-ws/530-e2c2_comments_scoping_plan_draft_aug11.doc)

Original File Name: E2C2 Comments Scoping Plan Draft Aug11.doc

Date and Time Comment Was Submitted: 2008-08-11 18:43:52

No Duplicates.

**Comment 298 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David  
Last Name: Hunter  
Email Address: hunter@ieta.org  
Affiliation: IETA

Subject: IETA's comments on Draft Scoping Plan and Appendices  
Comment:

Attached please find the International Emissions Trading  
Association's (IETA's) comments on the California Climate Change  
Draft Scoping Plan and Appendices.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/531-carb-ietacommentaug-11-2008.pdf](http://www.arb.ca.gov/lists/sp-general-ws/531-carb-ietacommentaug-11-2008.pdf)

Original File Name: CARB-IETACommentsAug-11-2008.pdf

Date and Time Comment Was Submitted: 2008-08-12 07:29:20

No Duplicates.

**Comment 299 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: James

Last Name: Brady

Email Address: cseghers@arb.ca.gov

Affiliation: Con10u, Inc.

Subject: AB 32 Scoping Plan and Appendices

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/532-8\\_05\\_08\\_jamesbradycon10u.pdf](http://www.arb.ca.gov/lists/sp-general-ws/532-8_05_08_jamesbradycon10u.pdf)

Original File Name: 8\_05\_08\_jamesbradycon10u.pdf

Date and Time Comment Was Submitted: 2008-08-12 09:16:49

No Duplicates.

**Comment 300 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Julio

Last Name: Alvarado

Email Address: cseghers@arb.ca.gov

Affiliation: Alvarado and Associates

Subject: AB 32 Scoping Plan and Appendices

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/533-8\\_06\\_08\\_alvaradoassociates.pdf](http://www.arb.ca.gov/lists/sp-general-ws/533-8_06_08_alvaradoassociates.pdf)

Original File Name: 8\_06\_08\_alvaradoassociates.pdf

Date and Time Comment Was Submitted: 2008-08-12 09:18:42

No Duplicates.

**Comment 301 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Steven

Last Name: Smith

Email Address: Steven.B.Smith@Saint-Gobain.com

Affiliation:

Subject: Draft Scoping Plan Appendices Comments

Comment:

Attached please find our comments on the Draft Scoping Plan  
Appendices.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/534-  
ca\\_ab32\\_draftscopingplanappendices\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/534-ca_ab32_draftscopingplanappendices_comments.pdf)

Original File Name: CA AB32 draftscopingplanappendices comments.pdf

Date and Time Comment Was Submitted: 2008-08-12 09:18:58

No Duplicates.

**Comment 302 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Deborah

Last Name: Sable

Email Address: cseghers@arb.ca.gov

Affiliation: Woodland Hills-Tarzana

Subject: AB 32 Scoping Plan and Appendices

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/535-7\\_31\\_08\\_woodlandhillstarzanachamber.pdf](http://www.arb.ca.gov/lists/sp-general-ws/535-7_31_08_woodlandhillstarzanachamber.pdf)

Original File Name: 7\_31\_08\_woodlandhillstarzanachamber.pdf

Date and Time Comment Was Submitted: 2008-08-12 09:23:10

No Duplicates.

**Comment 303 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rose

Last Name: Parish

Email Address: cseghers@arb.ca.gov

Affiliation: North Bay Black Chamber of Commerce

Subject: AB 32 Scoping Plan and Appendices

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/536-8\\_04\\_08\\_northbayblackchamber.pdf](http://www.arb.ca.gov/lists/sp-general-ws/536-8_04_08_northbayblackchamber.pdf)

Original File Name: 8\_04\_08\_northbayblackchamber.pdf

Date and Time Comment Was Submitted: 2008-08-12 09:25:07

No Duplicates.

## **Comment 304 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Peter

Last Name: Cooper

Email Address: pcooper@calaborfed.org

Affiliation: California Labor Federation's Workforce

Subject: Labor and AB 32

Comment:

Dear California Air Resources Board,

We're writing to let you know about a new Labor Center report: \*California's Global Warming Solutions Act of 2006: A Background Paper for Labor. \*This background paper analyzes AB 32, the Global Warming Solutions Act of 2006, a landmark law which aims to dramatically reduce California's greenhouse gas emissions.

The paper focuses on AB 32's potential impact on California jobs and workers, and highlights ways that California labor unions can engage in the implementation process to promote both lower emissions and good jobs.

To download a copy of the briefing paper, please visit:

[http://laborcenter.berkeley.edu/greenjobs/AB32\\_background\\_paper08.pdf](http://laborcenter.berkeley.edu/greenjobs/AB32_background_paper08.pdf)

<http://laborcenter.berkeley.edu/greenjobs/>

As you probably know, the AB 32 implementation process is already

underway, and labor's participation in these debates can play an important role in shaping how AB 32 ultimately affects working families in California.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/537-labor\\_ab32\\_background\\_paper08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/537-labor_ab32_background_paper08.pdf)

Original File Name: Labor\_AB32\_background\_paper08.pdf

Date and Time Comment Was Submitted: 2008-08-12 13:53:43

No Duplicates.

**Comment 305 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Derek

Last Name: Walker

Email Address: dbwalker@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF - General Comments

Comment:

Please accept the attached general comments from Environmental  
Defense Fund on the AB 32 draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/538-edf\\_-\\_general\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/538-edf_-_general_comments.pdf)

Original File Name: EDF - General Comments.pdf

Date and Time Comment Was Submitted: 2008-08-12 14:57:49

No Duplicates.

**Comment 306 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Stephen

Last Name: Burns

Email Address: Stephen.Burns@chevron.com

Affiliation: Chevron

Subject: Chevron Comments on Appendices

Comment:

Please see attached. Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/539-ab32\\_draft\\_scoping\\_plan2.pdf](http://www.arb.ca.gov/lists/sp-general-ws/539-ab32_draft_scoping_plan2.pdf)

Original File Name: AB32 Draft Scoping Plan2.pdf

Date and Time Comment Was Submitted: 2008-08-12 15:50:27

No Duplicates.

**Comment 307 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jim

Last Name: Antone

Email Address: jantone@ysaqmd.org

Affiliation: Yolo-Solano Air Quality Mgmt. District

Subject: AB 32 Draft Scoping Plan - Public Education

Comment:

Thank you for the oppotunity to comment on the Draft Scoping Plan  
Much of our society's motor vehicle dependence is both cultural  
and psychological. An aggressive public education campaign should  
be developed to encourage less motor vehicle dependance, especially  
for short trips. This campaign should include the GHG  
reduction/air quality benefits, energy independence, money saving  
and health benefits of less motor vehicle dependance.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-12 16:16:31

No Duplicates.

**Comment 308 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Richard  
Last Name: Lyon  
Email Address: rlyon@cbia.org  
Affiliation: CBIA

Subject: Comments: scoping Plan & Appendicies  
Comment:

thank you for the opportunity to offer these comments.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/541-cbia\\_final\\_carb\\_comments.zip](http://www.arb.ca.gov/lists/sp-general-ws/541-cbia_final_carb_comments.zip)

Original File Name: CBIA Final CARB Comments.zip

Date and Time Comment Was Submitted: 2008-08-12 16:41:17

No Duplicates.

**Comment 309 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: bill

Last Name: magavern

Email Address: bill.magavern@sierraclub.org

Affiliation:

Subject: SIERRA CLUB CALIFORNIA COMMENTS ON APPENDICES TO AB 32 DRAFT  
SCOPING PLAN

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/542-sierra\\_club\\_california\\_comments\\_appendices\\_ab\\_32\\_scoping\\_plan\\_final.doc](http://www.arb.ca.gov/lists/sp-general-ws/542-sierra_club_california_comments_appendices_ab_32_scoping_plan_final.doc)

Original File Name: Sierra Club California Comments Appendices AB 32 Scoping Plan  
final.doc

Date and Time Comment Was Submitted: 2008-08-12 17:13:26

No Duplicates.

**Comment 310 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gerard

Last Name: McCabe

Email Address: gmccabeesq@aol.com

Affiliation: KPC GEMB ENERGY LLC

Subject: General Comments on the APPENDICES

Comment:

KPC GEMB ENERGY LLC IS PLEASE TO SUBMIT THE ATTACHED COMMENTS ON  
THE APPENDICES

Attachment: [www.arb.ca.gov/lists/sp-general-ws/543-  
kpc\\_gemb\\_energy\\_llc\\_ab\\_32\\_scope\\_appendix\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/543-kpc_gemb_energy_llc_ab_32_scope_appendix_comments.pdf)

Original File Name: KPC GEMB ENERGY LLC AB 32 SCOPE appendix COMMENTS.pdf

Date and Time Comment Was Submitted: 2008-08-13 07:17:34

1 Duplicates.

**Comment 311 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michelle  
Last Name: Passero  
Email Address: MPassero@tnc.org  
Affiliation:

Subject: Please replace TNC Scoping Plan comments with this PDF version  
Comment:

Hello,

I just sent a Word version of TNC's Draft Scoping Plan comments.  
Could you please upload the attached pdf version instead?

Thank you

Attachment: [www.arb.ca.gov/lists/sp-general-ws/545-tnc\\_draft\\_scoping\\_plan\\_comments\\_final\\_\\_8\\_13\\_08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/545-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 13:47:41

No Duplicates.

**Comment 312 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: RTPA Group

Last Name: California

Email Address: CalRTPA-owner@yahoogroups.com

Affiliation: Regional Transportation Planning Agency

Subject: Regional Transportation Planning Agencies Scoping Plan Comments

Comment:

Attached are comments from the Regional Transportation Planning Agencies regarding the Draft Scoping Plan. We look forward to working with CARB staff to address these issues in the final plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/546-ab32\\_scoping\\_plan\\_rtpafinalcomments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/546-ab32_scoping_plan_rtpafinalcomments.pdf)

Original File Name: AB32 Scoping Plan RTPAFinalComments.pdf

Date and Time Comment Was Submitted: 2008-08-13 16:49:39

No Duplicates.

**Comment 313 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ali

Last Name: Morris

Email Address: cseghers@arb.ca.gov

Affiliation: Kern County Black Chamber of Commerce

Subject: AB 32

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/547-8\\_08\\_08\\_kerncountyblackchamber.pdf](http://www.arb.ca.gov/lists/sp-general-ws/547-8_08_08_kerncountyblackchamber.pdf)

Original File Name: 8\_08\_08\_kerncountyblackchamber.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:32:08

No Duplicates.

**Comment 314 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Patricia

Last Name: Watts

Email Address: cseghers@arb.ca.gov

Affiliation: FCI Management Consultants

Subject: AB 32

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/548-8\\_7\\_08\\_fcimanagementconsultants.pdf](http://www.arb.ca.gov/lists/sp-general-ws/548-8_7_08_fcimanagementconsultants.pdf)

Original File Name: 8\_7\_08\_fcimanagementconsultants.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:37:44

No Duplicates.

**Comment 315 for General Comments for the GHG Scoping Plan (sp-general-  
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-general-ws/549-sce\\_comments\\_on\\_draft\\_scoping\\_plan\\_appendices.pdf](http://www.arb.ca.gov/lists/sp-general-ws/549-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 10:38:17

No Duplicates.

**Comment 316 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: James

Last Name: Duran

Email Address: cseghers@arb.ca.gov

Affiliation: Hispanic Chamber of Commerce

Subject: AB 32

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/550-8\\_08\\_08\\_jamesduranhispanicchamber.pdf](http://www.arb.ca.gov/lists/sp-general-ws/550-8_08_08_jamesduranhispanicchamber.pdf)

Original File Name: 8\_08\_08\_jamesduranhispanicchamber.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:39:39

No Duplicates.

**Comment 317 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Becky  
Last Name: Bond  
Email Address: cseghers@arb.ca.gov  
Affiliation: CREDO action

Subject: AB 32  
Comment:

please see attached letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/551-8\\_08\\_08\\_credopetitioncover.pdf](http://www.arb.ca.gov/lists/sp-general-ws/551-8_08_08_credopetitioncover.pdf)

Original File Name: 8\_08\_08\_credopetitioncover.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:43:15

No Duplicates.

**Comment 318 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Francisco  
Last Name: Alvarez  
Email Address: cseghers@arb.ca.gov  
Affiliation: American GI Forum

Subject: AB 32  
Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/552-8\\_8\\_08\\_americangiforumactual.pdf](http://www.arb.ca.gov/lists/sp-general-ws/552-8_8_08_americangiforumactual.pdf)

Original File Name: 8\_8\_08\_americangiforumactual.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:45:53

No Duplicates.

**Comment 319 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Anna  
Last Name: Greenleaf  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32  
Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/553-7\\_29\\_08\\_greenleaf.pdf](http://www.arb.ca.gov/lists/sp-general-ws/553-7_29_08_greenleaf.pdf)

Original File Name: 7\_29\_08\_greenleaf.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:52:09

No Duplicates.

**Comment 320 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Carl

Last Name: Farrington

Email Address: carl.farrington@sbcglobal.net

Affiliation: South Coast Interfaith Council

Subject: Public Awareness and Involvement with the Plan

Comment:

As members of a social concerns committee of an interfaith organization we wish to comment on the need for (1) greater public awareness of and knowledge about California's Climate Change Plan and (2) greater public involvement with reducing greenhouse gas emissions.

Faith communities and civic organizations such as Rotary Clubs could be very effective in creating public awareness and helping the public become better informed. They could aim first at their own members. They could also sponsor forums with invited speakers. They can also prod their larger organizations at the county, state and national levels. They could petition their local city government to adopt resolutions aimed at higher governmental levels and at their own residents and businesses.

To stimulate greater public involvement in reducing emissions and conserving energy religious and civic groups could urge people to have a strong sense of responsibility about recycling and disposal of harmful materials. These groups could disseminate information about conserving water and energy and help people become more mindful of conservation practices. They could prompt local governments to find means to give commendation to good citizenship and also create ordinances with penalties for bad behavior.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-14 13:12:34

No Duplicates.

**Comment 321 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Duc  
Last Name: Vu  
Email Address: dvvu@aol.com  
Affiliation:

Subject: Effective Solution for Global Warming  
Comment:

Dear Sir/Madame:

Thank you for giving me an opportunity to comment on the AB32, which may be the first in the nation to try to solve the urgent climate change issue, which can be a catastrophe to our lives and the earth.

Congratulations to you, as always, the leading State in the United States of America, and maybe the world, in protecting the environment.

However, the AB32 is NOT effective to solve the climate change or global warming issue when it doesn't mention about the methane gas from raising cattle for meat, and the organic farming which is far more less carbon footprint than conventional farming with all kind of chemicals.

I was a resident of Santa Cruz, California during 1979-1986, and still have many of my family members in Los Angeles, CA, and all of my wife's immediate relatives are living in San Jose, CA, so I am very fond of the State of California, which is always my favorite state.

Attached is a document for many citizens to read and be more aware of the dire situation of our earth, and most importantly, knowing the solution which they play a vital role to be part of the solution.

May God bless America always.

Duc Vu

Attachment: [www.arb.ca.gov/lists/sp-general-ws/555-some\\_facts\\_on\\_global\\_warming.doc](http://www.arb.ca.gov/lists/sp-general-ws/555-some_facts_on_global_warming.doc)

Original File Name: Some\_FACTS\_ON\_GLOBAL\_WARMING.doc

Date and Time Comment Was Submitted: 2008-08-14 13:35:57

No Duplicates.

**Comment 322 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sandy

Last Name: Cajas

Email Address: cseghers@arb.ca.gov

Affiliation: Regional Hispanic Chamber of Commerce

Subject: AB 32 Scoping Plan and Appendices

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/556-8\\_12\\_08\\_regionalhispanicchamberofcommerce.pdf](http://www.arb.ca.gov/lists/sp-general-ws/556-8_12_08_regionalhispanicchamberofcommerce.pdf)

Original File Name: 8\_12\_08\_regionalhispanicchamberofcommerce.pdf

Date and Time Comment Was Submitted: 2008-08-14 14:00:59

No Duplicates.

**Comment 323 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Willie  
Last Name: Galvern  
Email Address: cseghers@arb.ca.gov  
Affiliation: American GI Forum

Subject: AB 32 Scoping Plan  
Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/557-8\\_06\\_08\\_americangiforumwglavern.pdf](http://www.arb.ca.gov/lists/sp-general-ws/557-8_06_08_americangiforumwglavern.pdf)

Original File Name: 8\_06\_08\_americangiforumwglavern.pdf

Date and Time Comment Was Submitted: 2008-08-14 14:04:55

No Duplicates.

**Comment 324 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Helen

Last Name: Galvern

Email Address: cseghers@arb.ca.gov

Affiliation: American GI Forum

Subject: AB 32 Scoping Plan

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/558-8\\_06\\_08\\_americangiforumhgalvern.pdf](http://www.arb.ca.gov/lists/sp-general-ws/558-8_06_08_americangiforumhgalvern.pdf)

Original File Name: 8\_06\_08\_americangiforumhgalvern.pdf

Date and Time Comment Was Submitted: 2008-08-14 14:05:49

No Duplicates.

**Comment 325 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kate

Last Name: White

Email Address: kwhite@uli.org

Affiliation: Urban Land Institute

Subject: Comments on Scoping Plan

Comment:

please see letter attached.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/559-uli\\_ca\\_to\\_carb\\_8-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/559-uli_ca_to_carb_8-08.pdf)

Original File Name: ULI CA to CARB 8-08.pdf

Date and Time Comment Was Submitted: 2008-08-14 14:37:23

No Duplicates.

**Comment 326 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Vicki

Last Name: Stasch

Email Address: vickistasch@comcast.net

Affiliation: citizen in Tulare County, bike commuter

Subject: no focus on carbon free commuting

Comment:

In reviewing the document I see little mention of pedestrian or bicycling as viable ways to address reduction of green house gases and I highly recommend these be added. In addition community planning that allows for connectivity for walkers and bicyclists needs to be included.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-14 15:52:01

No Duplicates.

**Comment 327 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Steven

Last Name: Kelly

Email Address: steven@iepa.com

Affiliation:

Subject: Comments of the Independent Energy Producers Association

Comment:

These are the comments of the Independent Energy Producers Association regarding Appendix C of The CARB Climate Change Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/561-iep\\_comments\\_on\\_appendix\\_c\\_-\\_final-8-14-08.doc](http://www.arb.ca.gov/lists/sp-general-ws/561-iep_comments_on_appendix_c_-_final-8-14-08.doc)

Original File Name: IEP Comments on Appendix C - FINAL-8-14-08.doc

Date and Time Comment Was Submitted: 2008-08-14 17:06:55

No Duplicates.

**Comment 328 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mary

Last Name: Luevano

Email Address: [mluevano@globalgreen.org](mailto:mluevano@globalgreen.org)

Affiliation: Global Green USA

Subject: Comments re: draft Scoping Plan

Comment:

please see attachement

Attachment: [www.arb.ca.gov/lists/sp-general-ws/562-  
gg\\_letter\\_to\\_carb\\_re\\_draft\\_scoping\\_plan.doc](http://www.arb.ca.gov/lists/sp-general-ws/562-gg_letter_to_carb_re_draft_scoping_plan.doc)

Original File Name: GG Letter to CARB re draft Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-08-14 17:34:04

No Duplicates.

**Comment 329 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Charlotte W.

Last Name: Myers

Email Address: charlotte@interfaithpower.org

Affiliation: California Interfaith Power & Light

Subject: AB32 Scoping Plan - General Comments

Comment:

Attn: Chairperson Mary Nichols

Please find our comments attached

Charlotte W. Myers

California Interfaith Power and Light

Attachment: [www.arb.ca.gov/lists/sp-general-ws/563-cipl\\_comments\\_on\\_ab32.doc](http://www.arb.ca.gov/lists/sp-general-ws/563-cipl_comments_on_ab32.doc)

Original File Name: CIPL Comments on AB32.doc

Date and Time Comment Was Submitted: 2008-08-14 17:52:31

No Duplicates.

## **Comment 330 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Linda

Last Name: Weiner

Email Address: linwiner@earthlink.net

Affiliation: American Lung Association of CA

Subject: Health and Medical Organizations Comments on Draft Scoping Plan

Comment:

HEALTH NETWORK FOR CLEAN AIR

August 15, 2008

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

As health and medical organizations, we are extremely concerned about the crisis of global warming and the reality that global warming will lead to serious public health problems and increase rates of illness, hospitalizations and premature death. Our health professionals are on the front lines dealing with the direct effects of global warming in daily interactions with the affected public and patients in hospitals and emergency rooms. We are especially concerned about impacts to vulnerable individuals including seniors, people with heart or lung disease, children and infants. We greatly appreciate the hard work of CARB staff in developing the draft-scoping plan to implement AB 32 and address these problems, but believe the plan needs substantial strengthening.

Air pollution already drives high mortality and morbidity numbers and global warming will only make this situation worse. The state is currently experiencing up to 24,000 premature deaths, 350,000 asthma attacks, thousands of hospitalizations and emergency room visits, and millions of missed school and work days from respiratory and cardiac illnesses caused by pollution. In addition, research shows that children in polluted areas of the state are growing up with reduced lung capacity due to pollution exposures that slow and stunt lung growth and development.

Global warming will pose a range of other health challenges to our communities at the same time we are dealing with the severe air pollution problems. Global warming is expected to increase sickness and death from heat waves and weather extremes, water pollution, increased and more widely distributed vector populations, increased potential for food-borne illness and other environmental challenges.

Clearly, public health must be a key consideration in the development of the scoping plan and other AB 32 related implementation activities. In order to make this happen, there needs to be a much higher level of engagement with the public health community, through both public health agencies and

organizations. While we appreciate that CARB has committed to do a public health analysis of individual scoping plan measures, we are concerned that this is only a beginning. We urge the board to take the following actions:

1) Establish a broader role for the public health community in the development of the scoping plan and broader implementation of AB 32. State and local public health agencies and organizations should have a formal and ongoing role in reviewing plans and strategies for greenhouse gas reduction and provide input on both the broader public health impacts of the mix of proposed measures (including gaps where additional measures could improve public health benefits) and the specific health benefits and concerns related to individual measures. Public health input is needed at every step in the process of developing mitigation measures and strategies to reduce global warming, both prior to and after the adoption of the scoping plan. When implementation begins, public health support can facilitate the public and community support needed for the local and regional changes.

2) Change the priorities and commitments in the scoping plan to better reflect public health concerns and provide a higher level of public health protection:

- Elevate the priority of significant shifts in transportation and land use in the scoping plan.

Given that 40% of greenhouse gases emanate from vehicles and vehicles are also a strong source of smog precursors, contributing to respiratory and heart disease, the state should place a much higher priority on efforts to reduce personal driving and commercial transportation. Promoting use of transportation alternatives such as walking, biking and public transit will lead to healthier lifestyles, less obesity and less chronic illness and injury.

- Establish measures to promote healthier communities including a stronger focus on reduction of vehicle miles traveled. The scoping plan must include a stronger statewide goal for reducing vehicle emissions and stronger measures to promote transit and changes in land use and transportation patterns that reduce personal driving.

- Set strong regional goals for greenhouse gas reduction  
As part of the push toward healthier communities, the state should establish strong regional goals to spur local action backed up by increased state resources to revise local and regional plans to support AB 32 goals.

- Take a cautious approach toward cap and trade  
CARB should approach market-based measures cautiously, limit their use and apply appropriate safeguards to ensure emission reductions are real, verifiable, surplus and permanent. In addition, CARB should ensure that pollution sources pay for emission allocations rather than allow free distribution. Cap and trade must not lead to further adverse impacts on communities already disproportionately impacted by the regulated industries and sectors, chronic disease and injury, and little or no access to health care.

- Focus on local health benefits of scoping plan measures, especially with regard to environmental justice communities.

The plan must not only prevent creation of pollution "hot spots" and real "heat islands", but should also demonstrate that measures will improve air quality and health conditions in local communities. Communities especially affected include those near ports, goods movement, power plants, agricultural and other industrial pollution sources.

- Direct revenues to assist community-level mitigation efforts. CARB should ensure that additional state revenues raised through greenhouse gas fees or cap and trade programs are directed to assist local community global warming mitigation and adaptation efforts, especially in environmental justice communities.

3) Engage the public health community in development of strategies for public outreach and messaging on global warming and mitigation strategies. Building public support for mitigation strategies will be critical to the success of the state's efforts. Public health forces have considerable expertise and experience in reaching out to and educating diverse communities, as well as helping structure the policies and environments to motivate and support healthy behavior change.

The CARB scoping plan currently estimates health benefits valued at \$2 billion, including reductions of premature deaths, asthma attacks and respiratory symptoms. While these numbers are significant, we believe these health benefits could be increased significantly by strengthening the plan as discussed above and focusing on measures with large air quality co-benefits.

Californians are in the middle of a public health crisis as evidenced by high levels of air pollution related illness, chronic disease associated with obesity and physical inactivity, and other health issues. The serious environmental challenges brought on by global warming will quickly overwhelm health service systems, particularly for low-income communities. Reducing global warming is a vital strategy that will help Californians breathe easier and prevent suffering from lung and heart disease, as well as promote community and transportation design change that can reduce the risk of chronic disease and injury.

We look forward to working with you toward the development of a strong, health protective, greenhouse gas reduction plan.

Sincerely,

Bonnie Holmes-Gen, Senior Policy Director  
American Lung Association of California

Donna Gerber, Director, Government Relations  
California Nurses Association/National Nurses Organizing  
Committee

David Claman, M.D., President  
California Thoracic Society

Bruce Pomer, Executive Director  
Health officers Association of California

Michael DeLollis, M.D., Chair, Community Health Committee  
Fresno-Madera Medical Society

Elina Green, MPH

Long Beach Alliance for Children with Asthma

Kevin Hamilton, RRT, RCP, Co-Director  
Medical Advocates for Healthy Air (Fresno)

Allyson Holman, Chair  
Merced-Mairposa County Asthma Coalition

Evan Krasner, M.D., Executive Director  
Physicians for Social Responsibility, San Francisco

Marice Ashe, JD, MPH, Director  
Public Health Law & Policy

Joel Ervice, Associate Director  
RAMP (Regional Asthma Management and Prevention)

William S. Sandberg, Executive Director  
Sierra Sacramento Valley Medical Society

Steve Heilig, MPH, Director Public Health & Education  
San Francisco Medical Society

Attachment: [www.arb.ca.gov/lists/sp-general-ws/565-health\\_network\\_org\\_scoping\\_plan\\_comments.doc](http://www.arb.ca.gov/lists/sp-general-ws/565-health_network_org_scoping_plan_comments.doc)

Original File Name: Health Network Org Scoping Plan Comments.doc

Date and Time Comment Was Submitted: 2008-08-15 14:30:40

No Duplicates.

**Comment 331 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joan

Last Name: Clayburgh

Email Address: joan@sierranevadaalliance.org

Affiliation: Sierra Nevada Alliance

Subject: Sierra Nevada Alliance Comments on Scoping Plan

Comment:

Attached is our general comments on the CARB Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/566-alliance\\_ab32\\_scope\\_comments\\_final.doc](http://www.arb.ca.gov/lists/sp-general-ws/566-alliance_ab32_scope_comments_final.doc)

Original File Name: Alliance AB32 Scope Comments FINAL.doc

Date and Time Comment Was Submitted: 2008-08-15 15:46:27

No Duplicates.

**Comment 332 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Matthew

Last Name: Vander Sluis

Email Address: mvander@pcl.org

Affiliation: Planning and Conservation League

Subject: Planning and Conservation League Comments on AB 32 DSP

Comment:

Attached are the comments from PCL on the AB 32 Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/567-  
pcl\\_comments\\_on\\_ab\\_32\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/567-pcl_comments_on_ab_32_draft_scoping_plan.pdf)

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

Date and Time Comment Was Submitted: 2008-08-15 16:12:54

No Duplicates.

**Comment 333 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Audrey  
Last Name: Chang  
Email Address: achang@nrdc.org  
Affiliation: NRDC

Subject: Letter from Coalition of Environmental, Public Health, and Renewable Energy groups  
Comment:

We respectfully submit these comments from a broad coalition of groups giving our suggestions on the Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/568-coalition\\_letter\\_re\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/568-coalition_letter_re_draft_scoping_plan.pdf)

Original File Name: Coalition Letter re Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-15 16:39:30

No Duplicates.

**Comment 334 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rachel  
Last Name: Dinno-Taylor  
Email Address: Rachel.Dinno@tpl.org  
Affiliation: Trust for Public Land

Subject: TPL's Scoping Plan comments  
Comment:

Please accept the attached comments from the Trust for Public Land  
on the Climate Change Draft Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/569-  
tpl\\_comments\\_\\_draft\\_scoping\\_plan\\_\\_ghg\\_benefits\\_of\\_urban\\_parks.pdf](http://www.arb.ca.gov/lists/sp-general-ws/569-tpl_comments__draft_scoping_plan__ghg_benefits_of_urban_parks.pdf)

Original File Name: TPL comments (Draft Scoping Plan) GHG Benefits of Urban Parks.pdf

Date and Time Comment Was Submitted: 2008-08-15 16:43:36

No Duplicates.

## **Comment 335 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Holly

Last Name: Foster

Email Address: foster22@cox.net

Affiliation: Citizen's Climate Lobby

Subject: Thank you for AB32

Comment:

I wanted to start by saying I attended the 8/15 meeting in San Diego and am very grateful for everything the state is doing in this regard. I just have a couple comments/suggestions:

1) Public Transportation - build it with meaningful placement and time travel options and people will use it. Also in this regard Ca has always been a leader in technology and a wide variety of companies have the technology and ability to allow people to work from home but have not went forward with this. Some tax breaks to companies offering work from home options may jump start this process and will take many cars off the road.

2)Some money should be set aside for research and development of renewable resources. I think a state trust to hold funds from polluters is a great idea and these funds should remain in set for meeting the goals of AB32 and the 2050 goals. Additional money may need to come from bonds but the economic development should make the bonds easy to repay.

3)A few concerns were mentioned about this initiative not furthering costs to the poor. Many will not be able to make the investment in buying their own solar panels and we have many renters in the state. Is is just as important for these individuals to do their part. The way to make this happen is to work with the energy companies to get them on board with utlizing renewable resources. There are very few companies but they are out there that will pay for the solar panels on your roof and thier maintenance and you just pay the same bill you always paid. This benefits the energy companies because in the long run this produces more energy then the cost of the equipment so that is their incentive. Individuals will work with this arrangement because they are used to it. Most cable companies own and maintain the equipment that provide that service. They will be part of the solution without the up front cost that many poor and middle class families just can't afford. To make this work there may have to be changes to how companies sell tie into the grid? I have heard that is true on a national level.

4)Fire prevention should be a part of AB32 because fires feed into the cycle of global warming by having less vegetation to breath in the CO2 and then causing more fires.

5) Since this is a long term problem the education dept should incorporate global warming legislation in the state education

framework.

Thank you so much!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-17 11:52:49

No Duplicates.

**Comment 336 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Theresa

Last Name: Acerro

Email Address: cseghers@arb.ca.gov

Affiliation: Southwest Chula Vista Civic Association

Subject: AB 32 Scoping Plan

Comment:

Please see attached comments

Attachment: [www.arb.ca.gov/lists/sp-general-ws/572-8\\_18\\_08\\_tacerro.pdf](http://www.arb.ca.gov/lists/sp-general-ws/572-8_18_08_tacerro.pdf)

Original File Name: 8\_18\_08\_tacerro.pdf

Date and Time Comment Was Submitted: 2008-08-18 11:47:10

No Duplicates.

**Comment 337 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Patti

Last Name: Krebs

Email Address: [iea@iea.sdcoxmail.com](mailto:iea@iea.sdcoxmail.com)

Affiliation: Industrial Enviromental Association

Subject: AB 32 Scopping Plan Comments

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/sp-general-ws/573-ab\\_32\\_scopping\\_plan\\_\\_letter9.doc](http://www.arb.ca.gov/lists/sp-general-ws/573-ab_32_scopping_plan__letter9.doc)

Original File Name: AB 32 Scopping Plan Letter9.doc

Date and Time Comment Was Submitted: 2008-08-18 14:35:06

No Duplicates.

**Comment 338 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Glenn

Last Name: Mosier

Email Address: cseghers@arb.ca.gov

Affiliation: UBS Financial Services Inc.

Subject: Scoping Plan

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/574-8\\_15\\_08\\_ubs.pdf](http://www.arb.ca.gov/lists/sp-general-ws/574-8_15_08_ubs.pdf)

Original File Name: 8\_15\_08\_UBS.pdf

Date and Time Comment Was Submitted: 2008-08-18 15:29:21

No Duplicates.

## **Comment 339 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Bonnie  
Last Name: Holmes-Gen  
Email Address: bhgen@alac.org  
Affiliation: American Lung Association of California

Subject: AB 32 Draft Scoping Plan Comments  
Comment:

August 18, 2008

Mary Nichols, Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Dear Chairman Nichols:

Re: American Lung Association of California Recommendations On  
Draft Global Warming Solutions Act Scoping Plan

The American Lung Association of California appreciates the California Air Resources Board's (CARB) tremendous dedication and effort to develop the draft Scoping Plan as a key step forward toward implementing AB 32 and creating a more sustainable energy economy. Without dramatic changes in our society and economy to reduce global warming, California's already severe pollution problems will only get worse and health costs will continue to climb higher. While the draft plan represents an important first step, we are urging the board to incorporate strengthening changes to substantially boost air quality, greenhouse gas reduction and public health benefits.

The public health crisis in California caused by the state's dependence on polluting petroleum fuels is a key reason why we must move forward quickly with the strongest possible greenhouse gas reduction measures. Moving away from petroleum fuels through strategies to clean up vehicles and fuels, change land use patterns, and promote alternative transportation modes and other greenhouse gas reduction strategies will not only help achieve the state's 2020 and 2050 targets, but will also provide tremendous co-benefits by attacking California's smog and toxic air pollution problems. With asthma at epidemic levels and thousands of premature deaths, hospitalizations and illnesses caused by air pollution each year, California must take strong action.

The American Lung Association appreciates that the draft scoping plan incorporates some strong elements. We are pleased to see a significant commitment to renewable power production in California

through the inclusion of a goal of achieving 33 percent of the state's power through renewable sources. We are also pleased that that the plan has a strong foundation in regulatory approaches that provide the most certainty with regard to achieving greenhouse gas emission reductions and providing the most accountability to the public. However, additional measures must be incorporated to significantly strengthen the plan.

As we have commented during the public hearings on the scoping plan, we strongly believe that protection of public health should be the key criteria to evaluate the various policy tools and strategies that are part of the scoping plan, as well as the broader implementation efforts under AB 32. In order to give priority consideration to public health, the board must ensure that the plan:

- 1) Places a high priority on measures that can achieve the greatest public health benefits and measures that can provide early reductions and improve air quality in communities already suffering from high levels of exposure to smog and toxic pollution from ports, goods movement, agricultural and industrial polluters and other hot spots.
- 2) Contributes to faster progress toward meeting state and federal clean air commitments for smog and particle pollution, and includes no elements that allow for backsliding on achievement of state and federal air quality standards.
- 3) Maximizes the air quality and public health co-benefits of all regulations and strategies for greenhouse gas reduction included in the plan.
- 4) Meets all requirements of AB 32 (Nunez/Pavley) for analysis of air quality impacts and impacts to disadvantaged communities.

We urge the board to adopt the following specific changes in the plan to ensure the plan meets the above criteria:

#### Public Health Analysis and Benefits

Establish a formal process for public health review and input into the scoping plan. We appreciate that CARB intends to publish an appendix outlining the public health impacts and benefits of the plan and believe this is an extremely important step. In order to be effective, the analysis must estimate the statewide and local impacts of both regulatory and market-based measures included in the plan, especially with regard to environmental justice communities. However, we believe that CARB needs to also establish a formal and ongoing process to review the priorities and overall public health impacts and implications of the scoping plan throughout its development and implementation as well as reviewing individual measures. We believe it is important for CARB to include representatives of key state and local public health agencies and organizations in this process.

The scoping plan must provide local public health protections. Many communities in California, in particular low-income communities and communities of color, live in close proximity to multiple sources of pollution, including ports, goods movement, agricultural and industrial pollution sources and experience higher health impacts. The plan must not only prevent disproportionate impacts or creation of "hot spots" of pollution as required by AB 32, but must also provide benefits to local communities such as additional resources and mitigation measures to speed up air quality progress.

## Transportation and Land Use

Boost greenhouse gas emission reductions from transportation and land use sectors. Transportation is the largest contributor to global warming and air pollution in California, representing 38% of greenhouse gas emissions and over 80% of nitrogen oxide emissions that contribute to smog and particulate pollution. Cars and light trucks make up the majority of the greenhouse gas emissions from the transportation sector. The state must commit to stronger transportation measures to meet the 2020 target and to lay the groundwork for the more challenging 2050 greenhouse gas reduction target.

Set a higher bar for reduction of vehicle miles travelled or "VMT."

With current growth and development patterns, VMT is expected to increase by 70% over the next 30 years. This level of growth in vehicle use would cancel out progress made in reducing greenhouse gas emissions through introduction of cleaner vehicles and fuels. The plan's current goal of achieving 2 million metric tons of greenhouse gas reductions from VMT reduction is far too low. The state should set a higher goal of at least 10 million metric tons and provide the leadership and support to help local governments change land use and transportation patterns to achieve the goal.

Establish strong regional greenhouse gas reduction targets: The best way to ensure that local governments make the changes necessary in land use and transportation planning to support compact and more efficient development patterns and reduced VMT is to establish strong regional targets for greenhouse gas reduction. These regional targets must include a mechanism to hold cities and counties accountable for achieving their share of emission reductions.

Include measures to expand public transportation systems: Expanding California's public transportation system, providing full funding of public transportation in the state budget this year and providing consistent ongoing funding are critical measures to promote reduced need for driving. An increased emphasis on public transit is important to support local and regional agency efforts to change transportation and land use plans in order to emphasize smart growth strategies. Unfortunately, the current draft makes little mention of public transit.

Include indirect source rules as well as additional measures to reduce vehicle trips: Communities across the state can benefit from using indirect source rules to ensure that the greenhouse gas and air pollution emissions from developments are calculated and mitigated. This is another strategy to promote compact development patterns, transportation options such as walking and bicycling, less driving and healthier, more livable communities.

Accelerate efforts to introduce zero emission vehicles: CARB should establish more aggressive goals for introducing new pure zero emission vehicles such as battery electric vehicles and fuel cell vehicles into the vehicle fleet, especially in the 2015 -2020 timeframe. CARB should also establish requirements for automakers

to expand use of electric drive technologies across the new vehicle fleet, including conventional hybrid and plug-in hybrid technologies, in new vehicles.

#### Market Mechanisms

Take a cautious and slow approach to market-based measures: CARB should approach market-based measures cautiously, limit their use and apply appropriate safeguards to maximize air quality and health benefits. Measures should be carefully designed to provide real, quantifiable and surplus reductions, maximize criteria air pollutant co-benefits, provide near-term benefits to local communities in terms of emission reductions and mitigation funds, limit use of offsets, include a strong enforcement program and ensure that pollution sources pay for emission allocations rather than allowing free distribution. Any cap and trade program adopted by CARB must include, from the start, a requirement for pollution sources to pay for all emission allocations through an auction with the revenues applied toward public interest projects.

CARB should also be very cautious about linking to other state or regional cap and trade programs such as the Western Climate Initiative (WCI). While we appreciate the value of developing regional approaches to reducing greenhouse gas emissions, California should not accept weaker cap and trade or offset requirements in order to join a regional market. Before considering linkage with other programs including WCI, CARB should ensure that these programs contain strong safeguards, including those listed above.

Offsets must be limited to avoid reduction of air quality and community benefits:

In order to achieve AB 32 goals, California will have to drive development and implementation of new, innovative clean technologies that can achieve the maximum level greenhouse gas reduction. We are tremendously concerned that offsets, especially those generated outside of the state, will reduce the incentive for California's industries to transition to less carbon intensive manufacturing and production technologies. If offsets are going to be allowed, they should be limited to a small percentage of a facility's greenhouse gas reduction requirements. In addition, CARB needs to address how offsets would be evaluated and monitored on an ongoing basis to ensure they are real, verifiable, permanent and surplus.

We are also extremely concerned about the direction provided in the current draft of the scoping plan regarding offsets. The current proposal implies that sources in a cap and trade program would be able to cover 100 percent of their required (cap and trade) emission reductions by purchasing offsets rather than reducing emissions. This would be completely unacceptable from a public health perspective. If CARB does pursue an offsets program, we urge CARB to ensure that companies can only count offsets toward meeting a small percentage (less than 10%) of the required emission reductions.

Direct revenues to public interest programs, including community-level mitigation efforts.

CARB should ensure that additional state revenues raised through greenhouse gas fees or cap and trade programs are directed to

assist global warming mitigation and adaptation efforts including energy efficiency, especially in environmental justice communities. We also join the Coalition For Clean Air and other organizations in recommending that a fixed percentage of revenues from market-based programs should be directed toward the establishment of a "community benefits fund" to assist communities suffering from disproportionate air pollution impacts.

#### Goods Movement

Incorporate stronger measures to reduce greenhouse gases from goods movement.

We believe there are significant opportunities for CARB to accelerate reductions of greenhouse gases from the goods movement sector, which is responsible for 20% of greenhouse gas emissions in the transportation sector as well as substantial adverse air quality and health impacts to communities near ports, railyards and other goods movement facilities. The serious health impacts and projected tremendous increase in goods movement activity at the ports calls for a greater level of effort to reduce criteria pollutant, toxics and greenhouse gas emissions. The opportunities range from electrifying vehicles, vessels and equipment such as switching locomotives, trucks, yard hostlers and tugs and increasing on-dock rail for more efficient container transport to incorporating efficiency measures and low carbon technologies into new port projects and developing more efficient containers and freight handling and operations at ports. We urge CARB to increase the scoping plan's commitment to reducing emissions from goods movement measures to assist in efforts to meet both short and long-term greenhouse gas reduction targets.

#### Industrial Sector

Strengthen regulatory requirements on industrial pollution. CARB should include in the scoping plan additional strong regulatory measures to reduce greenhouse gas emissions in the industrial sector, such as petroleum refineries, power plants, and cement plants. Industrial sources account for 20% of the state's greenhouse gas emissions and also contribute significantly to local and statewide air quality problems. We believe the state should not rely solely on market measures to reduce emissions from this sector. Furthermore, additional regulatory measures on these types of facilities will provide important air quality and health benefits to the communities where they are located.

#### Energy

Maintain a strong commitment to a 33% renewable portfolio standard (RPS) Since electricity makes up 23% of greenhouse gas emissions in California, pursuing renewable energy sources is extremely important. We strongly support CARB's commitment to a 33% RPS. Both investor-owned and publicly-owned utilities must invest in more renewable energy sources, including wind, solar, and geothermal resources. Increased use of renewables will decrease California's reliance on fossil fuels and reduce greenhouse gas emissions from the energy producing sector.

#### Public Outreach and Education

A strong outreach and education program is critical to the success of the state's greenhouse gas reduction efforts. We urge CARB to adopt a comprehensive public outreach and education program to

assist in the AB 32 implementation effort and to seek formal input and assistance from the public health community in developing this program. The state can build on highly successful social marketing campaigns to reduce tobacco use as well as programs it has previously established such as "Spare the Air" and "Flex Your Power" campaigns.

In conclusion, the American Lung Association appreciates CARB's effort to date on this groundbreaking state greenhouse gas plan and looks forward to continue working with you to ensure the plan is strong, health protective, and provides a solid framework for success in reaching the state's 2020 and 2050 goals.

Sincerely,

Bonnie Holmes-Gen  
Senior Policy Director

Linda Weiner  
Director, Air Quality Advocacy and Outreach

Attachment: [www.arb.ca.gov/lists/sp-general-ws/575-alac\\_comments\\_august\\_18\\_final.doc](http://www.arb.ca.gov/lists/sp-general-ws/575-alac_comments_august_18_final.doc)

Original File Name: ALAC comments August 18 Final.doc

Date and Time Comment Was Submitted: 2008-08-19 08:28:22

No Duplicates.

**Comment 340 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jose

Last Name: Solache

Email Address: cseghers@arb.ca.gov

Affiliation: Lynwood Unified School District

Subject: AB 32 Scoping Plan and Appendices

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/576-8\\_14\\_08\\_solache.pdf](http://www.arb.ca.gov/lists/sp-general-ws/576-8_14_08_solache.pdf)

Original File Name: 8\_14\_08\_solache.pdf

Date and Time Comment Was Submitted: 2008-08-19 09:49:44

No Duplicates.

**Comment 341 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: George

Last Name: Cole

Email Address: cseghers@arb.ca.gov

Affiliation: Oldtimers Foundation

Subject: AB 32 Scoping Plan and Appendices

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/577-8\\_14\\_08\\_oldtimers.pdf](http://www.arb.ca.gov/lists/sp-general-ws/577-8_14_08_oldtimers.pdf)

Original File Name: 8\_14\_08\_oldtimers.pdf

Date and Time Comment Was Submitted: 2008-08-19 09:51:25

No Duplicates.

**Comment 342 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Josefina

Last Name: Herrera

Email Address: cseghers@arb.ca.gov

Affiliation: Federacion De Clubes Chihuahuenses

Subject: AB 32 Scoping Plan and Appendices

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/578-8\\_14\\_08\\_herrera.pdf](http://www.arb.ca.gov/lists/sp-general-ws/578-8_14_08_herrera.pdf)

Original File Name: 8\_14\_08\_herrera.pdf

Date and Time Comment Was Submitted: 2008-08-19 09:53:31

No Duplicates.

**Comment 343 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 344 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Janett

Last Name: Sanchez

Email Address: cseghers@arb.ca.gov

Affiliation: Lynwood latino Coalition

Subject: AB 32 Draft Scoping Plan and Appendecies

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/580-8\\_14\\_08\\_jsanchez.pdf](http://www.arb.ca.gov/lists/sp-general-ws/580-8_14_08_jsanchez.pdf)

Original File Name: 8\_14\_08\_jsanchez.pdf

Date and Time Comment Was Submitted: 2008-08-19 09:56:31

No Duplicates.

**Comment 345 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

## **Comment 346 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Randy

Last Name: Hayes

Email Address: randy.hayes@worldfuturecouncil.org

Affiliation: World Future Council

Subject: Feed-in Tariffs

Comment:

In order to hit the targets and timelines (to save this fragile planetary climate system) we need policy arrangements that:

- Guarantee renewable energy access to the grid for small, medium, and large providers
- Pay a decent price to the energy provider, whether that is an individual home owner, small business, farmer, or major power plant
- Guarantee the policy program for a solid number of years (for example a 20 year program)
- Have flexibility to adjust prices from time to time.
- Phase out the program over the 20 years.

The FEED-IN TARIFF approach similar to Germany, Spain, and Switzerland is the kind of approach that can deliver the above arrangements.

One can hardly ask for too much when it comes to developing a zero waste, closed loop, sustainable production and consumption society that is powered by renewable energy. We had better not ask for too little if we want future generations to have a dignified life.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-19 09:58:33

No Duplicates.

**Comment 347 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Liza

Last Name: Tran

Email Address: cseghers@arb.ca.gov

Affiliation: Spectacular Design, Inc

Subject: AB 32 Implementation

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/583-8\\_11\\_08\\_spectaculardesign.pdf](http://www.arb.ca.gov/lists/sp-general-ws/583-8_11_08_spectaculardesign.pdf)

Original File Name: 8\_11\_08\_spectaculardesign.pdf

Date and Time Comment Was Submitted: 2008-08-19 13:27:34

No Duplicates.

**Comment 348 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jared  
Last Name: Rivera  
Email Address: cseghers@arb.ca.gov  
Affiliation: LA Voice Pico

Subject: AB 32 Draft Scoping Plan and Appendicies  
Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/584-8\\_11\\_08\\_lavoicepico.pdf](http://www.arb.ca.gov/lists/sp-general-ws/584-8_11_08_lavoicepico.pdf)

Original File Name: 8\_11\_08\_lavoicepico.pdf

Date and Time Comment Was Submitted: 2008-08-19 13:29:45

No Duplicates.

**Comment 349 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

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

**Comment 350 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Monico

Last Name: Sevilla

Email Address: cseghers@arb.ca.gov

Affiliation: Norwalk Youth Soccer League

Subject: AB 32 Draft Scoping Plan and Appendecies

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/586-8\\_15\\_08\\_msevilla.pdf](http://www.arb.ca.gov/lists/sp-general-ws/586-8_15_08_msevilla.pdf)

Original File Name: 8\_15\_08\_msevilla.pdf

Date and Time Comment Was Submitted: 2008-08-19 13:46:27

No Duplicates.

**Comment 351 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Donald

Last Name: Lee

Email Address: cseghers@arb.ca.gov

Affiliation: San Diego Sierra Club

Subject: Draft Scoping Plan

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/587-8\\_15\\_08\\_dleesierra.pdf](http://www.arb.ca.gov/lists/sp-general-ws/587-8_15_08_dleesierra.pdf)

Original File Name: 8\_15\_08\_dleesierra.pdf

Date and Time Comment Was Submitted: 2008-08-19 14:03:37

No Duplicates.

**Comment 352 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Eleanora

Last Name: Robbins

Email Address: cseghers@arb.ca.gov

Affiliation: San Diego State University

Subject: Draft Scoping Plan

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/588-8\\_15\\_08\\_drrobbins.pdf](http://www.arb.ca.gov/lists/sp-general-ws/588-8_15_08_drrobbins.pdf)

Original File Name: 8\_15\_08\_drrobbins.pdf

Date and Time Comment Was Submitted: 2008-08-19 14:05:22

No Duplicates.

**Comment 353 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Nancy

Last Name: McCleary

Email Address: cseghers@arb.ca.gov

Affiliation: League of Women Voters

Subject: Draft Scoping Plan

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/589-8\\_15\\_08\\_nmcclareylwv.pdf](http://www.arb.ca.gov/lists/sp-general-ws/589-8_15_08_nmcclareylwv.pdf)

Original File Name: 8\_15\_08\_nmcclareylwv.pdf

Date and Time Comment Was Submitted: 2008-08-19 14:06:42

No Duplicates.

## **Comment 354 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Leron  
Last Name: Rabinowiz  
Email Address: leronr@gmail.com  
Affiliation:

Subject: Eco-Eating benefits: transport, water, electric & agriculture  
Comment:

A vegetarian (vegan) diet is by far the best solution to global warming.

Almost all of your outlined green house gasses sectors are affected by the production of an animal diet which is very intensive on our planet and our human health, since a meat diet is linked to the cause of many diseases costing our health industry billions. Moreover, more potent than CO2 is nitrous oxide (almost 300x more potent) which is caused by a meat diet. Don't take my word for it, below are scientific evidence showing

UN report - livestock's long shadow  
<http://www.fao.org/newsroom/en/news/2006/1000448/index.html>

Eco-Eating-Eating as if the Earth Matters  
<http://www.brook.com/veg/>

Howard Lyman, LL.D.  
<http://www.vegsource.com/lyman/>

New York Times  
<http://www.youtube.com/watch?v=5YkNkscBEp0>

Paul McCartney - Devour the Earth  
<http://www.youtube.com/watch?v=0b2k98YLSnk>

a sacred duty  
<http://www.youtube.com/watch?v=Y9RxmTGHZgE>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-20 06:35:19

No Duplicates.

**Comment 355 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Thomas  
Last Name: Heider  
Email Address: hohi@arcor.de  
Affiliation:

Subject: Love for our Planet  
Comment:

Save our planet!  
Be green! Go veg!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-20 09:44:17

No Duplicates.

**Comment 356 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jane  
Last Name: Pham  
Email Address: jplotuspearl@yahoo.com  
Affiliation:

Subject: Veganism: Immediate Solution to Climate Change  
Comment:

Albert Einstein once said, "Nothing will benefit human health or increase the chances for survival of life on earth as the evolution to a vegetarian diet."

I'm totally taken by surprise that Veganism/Vegetarianism and Organic Farming were not listed nor considered as immediate, effective solutions to climate change within your plan.

Aren't there enough evidence and scientific research pointing to meat consumption being the leading cause of global warming. In fact, roughly 80% of it is.

Together, we can reserve the detrimental environmental damage as quickly as within three months if the entire earth population were to observe veganism/vegetarianism.

C'mon, wake up, leaders. Please start answering the call.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-20 09:59:55

No Duplicates.

**Comment 357 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Amy

Last Name: Tran

Email Address: cseghers@arb.ca.gov

Affiliation: Chinese-Vietnamese American Association

Subject: AB 32 Implementation

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/593-8\\_11\\_08\\_amytran.pdf](http://www.arb.ca.gov/lists/sp-general-ws/593-8_11_08_amytran.pdf)

Original File Name: 8\_11\_08\_amytran.pdf

Date and Time Comment Was Submitted: 2008-08-20 15:57:38

No Duplicates.

**Comment 358 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Annette

Last Name: Marron

Email Address: cseghers@arb.ca.gov

Affiliation: California School Employees Association

Subject: AB 32 Implementation

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/594-8\\_11\\_08\\_annettemarron.pdf](http://www.arb.ca.gov/lists/sp-general-ws/594-8_11_08_annettemarron.pdf)

Original File Name: 8\_11\_08\_annettemarron.pdf

Date and Time Comment Was Submitted: 2008-08-20 15:59:19

No Duplicates.

**Comment 359 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Diane

Last Name: Peralta

Email Address: cseghers@arb.ca.gov

Affiliation: Alhambra Teachers Association

Subject: AB 32 Implementation

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/595-8\\_11\\_08\\_dianeperalta.pdf](http://www.arb.ca.gov/lists/sp-general-ws/595-8_11_08_dianeperalta.pdf)

Original File Name: 8\_11\_08\_dianeperalta.pdf

Date and Time Comment Was Submitted: 2008-08-20 16:00:41

No Duplicates.

**Comment 360 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Virginia

Last Name: Ta

Email Address: virginialotus@msn.com

Affiliation:

Subject: Consider

Comment:

Please include Veganism/Vegetarianism and Organic Farming on your tactics against global warming!

I hope my opinion matters in some way. I think Veganism/Vegetariaism and Organic Farming will help against global warming, and save our planet in so many ways!

It's not as hard at all, if you know what to eat and make. Please consider this!

-Virginia Ta, Utah.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-20 20:55:37

No Duplicates.

**Comment 361 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lesa

Last Name: Heebner

Email Address: cseghers@arb.ca.gov

Affiliation: Councilmember, City of Solana Beach

Subject: Scoping Plan

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/597-8\\_15\\_08\\_cityofsolanabeach.pdf](http://www.arb.ca.gov/lists/sp-general-ws/597-8_15_08_cityofsolanabeach.pdf)

Original File Name: 8\_15\_08\_cityofsolanabeach.pdf

Date and Time Comment Was Submitted: 2008-08-21 14:02:54

No Duplicates.

**Comment 362 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Christine  
Last Name: Seghers  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

ARB has received over 30 letters similar to the attached example

Attachment: [www.arb.ca.gov/lists/sp-general-ws/598-8\\_6\\_08\\_keepthescopingplanstrongformletter.pdf](http://www.arb.ca.gov/lists/sp-general-ws/598-8_6_08_keepthescopingplanstrongformletter.pdf)

Original File Name: 8\_6\_08\_keepthescopingplanstrongformletter.pdf

Date and Time Comment Was Submitted: 2008-08-21 14:35:00

No Duplicates.

**Comment 363 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jason  
Last Name: Barbose  
Email Address: cseghers@arb.ca.gov  
Affiliation: Environment California

Subject: Global Warming Solutions  
Comment:

ARB has received approximately 41,000 of the attached postcard

Attachment: [www.arb.ca.gov/lists/sp-general-ws/599-7\\_24\\_08\\_environmentcaliforniapostcards.pdf](http://www.arb.ca.gov/lists/sp-general-ws/599-7_24_08_environmentcaliforniapostcards.pdf)

Original File Name: 7\_24\_08\_environmentcaliforniapostcards.pdf

Date and Time Comment Was Submitted: 2008-08-21 14:38:05

No Duplicates.

**Comment 364 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Bradley

Last Name: Baker

Email Address: cseghers@arb.ca.gov

Affiliation: Sonoma Mountain Village

Subject: AB 32 Scoping Plan

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/600-8\\_20\\_08\\_sonomamountainvillage.pdf](http://www.arb.ca.gov/lists/sp-general-ws/600-8_20_08_sonomamountainvillage.pdf)

Original File Name: 8\_20\_08\_sonomamountainvillage.pdf

Date and Time Comment Was Submitted: 2008-08-22 11:42:34

No Duplicates.

**Comment 365 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Don

Last Name: Winn

Email Address: donsta@yahoo.com

Affiliation:

Subject: We can solve 80% of global warming by using animal-free products!

Comment:

Switching to a vegetarian or vegan diet is the easiest and fastest way to combat global warming. Green technologies are too slow to develop since our time toward the point-of-no-return is within a couple of years. We know the solution to solve global warming, please help spread this solution! Thank you!!  
<http://www.youtube.com/watch?v=Og1DVnUp7jo>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-23 02:01:48

No Duplicates.

**Comment 366 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Neil

Last Name: ta

Email Address: whereisneil@gmail.com

Affiliation:

Subject: Time to act

Comment:

Please act now for a cleaning air and sustainable energy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-24 09:36:20

No Duplicates.

## **Comment 367 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

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

Subject: Scoping Plan Comment  
Comment:

Dear CARB,

Thank you for your efforts to protect the natural resources of California through climate protection measures. Please consider the following recommendations for the Final Scoping Plan:

1. The State should auction 100% of permits under the cap. Polluters must pay for their emissions instead of continuing to enjoy private profits at public cost. The atmosphere belongs to all of us.
2. The plan should specify that all auction revenues will be used to provide a dividend for consumers. This will help consumers deal with rising fuel and electricity costs.
3. CARB's proposal for Carbon Fees on fossil fuel companies can also fund clean technologies, green jobs, energy efficiency and conservation (building retrofits), etc.

Sincerely,

Stacey Meinzen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-26 14:00:33

No Duplicates.

## **Comment 368 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Barry  
Last Name: Vesser  
Email Address: barryv@saber.net  
Affiliation:

Subject: Please include Cap and Dividend as preferred alternative in the Scoping Plan  
Comment:

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 traveled. This is such an exciting opportunity for California to show the rest of the country what must be done. 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. Scientists are telling us that the need to act is urgent!
- 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 the Cap & Dividend approach formulated by Peter Barnes in his numerous books on the subject.
- 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,

Barry Vesser

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-26 18:22:31

No Duplicates.

**Comment 369 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Daniel

Last Name: Douglass

Email Address: douglass@energyattorney.com

Affiliation: Direct Access Customer Coalition

Subject: Draft Scoping Plan - DACC Comments

Comment:

The attached comments are submitted on behalf of the Direct Access  
Customer Coalition.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/606-dacc\\_ghg\\_comments\\_-\\_final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/606-dacc_ghg_comments_-_final.pdf)

Original File Name: DACC GHG Comments - FINAL.pdf

Date and Time Comment Was Submitted: 2008-08-26 21:29:02

No Duplicates.

**Comment 370 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Homer

Last Name: Carlisle

Email Address: hcarlisle@apta.com

Affiliation: American Public Transportation Assoc.

Subject: APTA comments re Transportation Sector and Land Use and Local Government Sector  
emissions

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/607-  
apta\\_carb\\_scoping\\_plan\\_comments\\_082608.pdf](http://www.arb.ca.gov/lists/sp-general-ws/607-<br/>apta_carb_scoping_plan_comments_082608.pdf)

Original File Name: APTA CARB Scoping Plan comments 082608.pdf

Date and Time Comment Was Submitted: 2008-08-27 08:50:10

No Duplicates.

## **Comment 371 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Julie

Last Name: Bolton

Email Address: dr.jbolton@charter.net

Affiliation: Long Beach DHSS

Subject: built environment & health benefits

Comment:

I write as family physician from Long Beach and a consultant on diabetes and obesity prevention for the Long Beach DHHS and wish to point out how CARBS changes to the built might affect the health of my city beyond the obvious respiratory benefits to reducing air pollution.

First know Long Beach has one of the highest rates of diabetes and obesity in the state in both adults and children. This is a major public health problem. Like physicians and public health departments everywhere we struggle daily to reverse the trend as well as find resources to treat diabetes - a costly disease

Twenty-four percent of our 5-19 year old children are overweight and the majority of these will be overweight as adults at high risk for diabetes. Our children are also unfit. In Long Beach, more than 25% of children in 5th grade and 45% of 9th graders did not score in the healthy fitness zone on the California physical fitness test. The problem is multi-factorial but a lack of physical activity is important.

If CARB's built environment made families feel it is safe to let their children bike or walk to school this would help turn the tide of childhood obesity. How much is unsure but consider that in 1960 more than 60% of children walked or biked to school. Today that number is only 13% - many people don't have safe routes. If built environment changes double the number of children who walk to school it would increase fitness and decrease obesity. For example, if a 60 pound child, a walking a mile each way to and from school they would burn an extra 100 calories per day. Over the school year, that extra 100 calories per day would equal five pounds of energy expended. In a small child 5 pounds may be enough to make an overweight child normal weight and more fit.

How would the CARB changes affect our adults? In Long Beach, 25% of adults are obese and 38% are overweight. Currently, Long Beach has a rate of diabetes approaching 10% - which is almost twice the rate of 1999 and higher than the LA county average.

If even 10% of our adult population were able to change their method of transportation to and from auto to walking we could potentially reverse the trend in obesity. For example a 15 minute one way walk, the average 150 pound person would burn approximately 200 extra calories per day. Over the course of a year, those individuals that would burn 52,000 calories more than they would have otherwise - 52,000 calories is equal to 15 pounds!

This is of course only speculative but it demonstrates the potential benefit adoption of the Global Warming Solutions Act could have to an unaddressed area of health. A detailed statewide analysis of how changes in the built environment affect the obesity epidemic and diabetes must be included for a complete picture to emerge. If these measures would avert even a small portion of the costs associated with treating diabetes and obesity, millions of dollars could be saved annually. Finally, it must be emphasized that the costs averted translate to suffering prevented - by preventing diabetes and its consequences- blindness, kidney failure, limb amputation, and early death.

Thank you

Dr. Julie Bolton

Public Health Physician Consultant

City

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-27 11:02:04

No Duplicates.

**Comment 372 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: Southern California Public Power Author

Subject: SCPPA Straight Talk about Climate Change

Comment:

Please find attached a document authored by the Southern California Public Power Authority ("SCPPA") and entitled "Straight Talk about Climate Change." The document concisely presents SCPPA's views on AB 32 implementation by the ARB.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/609-straight\\_talk\\_about\\_climate\\_changewchart\\_\\_2\\_.pdf](http://www.arb.ca.gov/lists/sp-general-ws/609-straight_talk_about_climate_changewchart__2_.pdf)

Original File Name: Straight Talk about Climate Changewchart \_2\_.pdf

Date and Time Comment Was Submitted: 2008-08-27 17:43:36

No Duplicates.

## **Comment 373 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Chris

Last Name: Corr

Email Address: enlightened@hotmail.com

Affiliation: All for All

Subject: Vegan = climate change cessation = happy

Comment:

Vegan = climate change cessation = happy

At the moment, the amount of grain fed to livestock each year in the US alone total are enough to feed 840 million people. This is much more than the number of people starving in the world today.

Also, the amount of greenhouse gases emitted by livestock is more than 18% of total world greenhouse gas emissions.. Moreover, the emission from livestock has a comparatively high level of methane content (nitrous oxide also) ~ and methane is a much stronger contributor o globl warming. The methane cycle is faster then the CO2 cycle however, so a reduction in methane production would see a much faster shift in climate change factors than a reduction in CO2 (cycle of over 50 years).

Given the immediacy of the threat ~ according to the IPCC (international panel on climate change ~ the UN's highest body on climate change - the reports of which are agreed line by line by over 150 member states) going vegetarian is the single biggest contribution that an individual can make to averting climate change.

Vegan = climate change cessation = happy

<<All of this before even talking about the destruction of rainforests, animal suffering, the huge unnecessary wastage of water and land resouces, the cost of meat eating on human health, etc etc>>

When I came to know all this information, I felt very strongly that it was worth sharing. I trust you feel the same.

Of course not everyone can shift to vegetarian fast... not everyone has the will to carry out their own wishes... so promotion of meat-reduction is the easier option... but maybe the promotion of vegetarianism will really wake a lot of people up (aim higher than the target), and certainly cause a shift in thinking; the very shift in thinking required to help shift our climate consciousness. It's no longer the time to eat lives, but to save lives.

Millions are awaiting forthright leadership; Wishing you the strength to steer well.

Vegan = climate change cessation = happy

CC  
enlightened@hotmail.com

Attachment: [www.arb.ca.gov/lists/sp-general-ws/610-aw\\_650\\_\\_dr.\\_rajendra\\_pachauri\\_ipcc\\_\\_-\\_table.doc](http://www.arb.ca.gov/lists/sp-general-ws/610-aw_650__dr._rajendra_pachauri_ipcc__-_table.doc)

Original File Name: AW 650 (Dr. Rajendra Pachauri IPCC) - table.doc

Date and Time Comment Was Submitted: 2008-08-27 18:36:33

No Duplicates.

**Comment 374 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Xiaohong

Last Name: Huang

Email Address: huangxhm@yahoo.com.cn

Affiliation:

Subject: include Veganism/Vegetarianism and Organic Farming on CA's tactics against global warming

Comment:

Go Vegan, Be Green, Save the Planet

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-27 18:52:31

No Duplicates.

**Comment 375 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Aseem

Last Name: Kawatra

Email Address: aseemkawatra@hotmail.com

Affiliation:

Subject: Reducing our carbon foot print - preventing global warming

Comment:

To whom it may concern

there is an increasing body of research from scientists and government alike that point to the livestock industry as a major contributing factor to global warming. Such reports include the UN Food and Agriculture Organization's "Livestock's Long Shadow Report". In the light of this emerging evidence I would suggest the promotion of vegetarianism as an important strategy to prevent global warming and protecting our planet. And it is the schools and governments that have the resources and capability of really making a difference by educating the public on how our diet can affect the world around us. I sincerely hope that the world's leaders will take up the noble mission to help protect the environment as well as the health of the people.

Thank you for your time

Mr. Aseem Kawatra

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-28 01:00:50

No Duplicates.

## **Comment 376 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Michael

Last Name: Wang

Email Address: iwxi@163.com

Affiliation:

Subject: Encourage Veganism to hold Climate Change

Comment:

Thanks a lot for your great effort on holding the Global Warming. As UN FAO conclude livestock is the main reason of Global Warming, So I hope Veganism could be paid enough attention by all the government.

1. Livestock production is a great waste of food and resources, the resource to feed 1 beef eater could feed 20 vegetarian. For the growing Food Crisis, I think I could also say that one beef eater cause 19 famine refugees.

2. Livestock is also the main pollution source, their excrement pollute our soil, our water and our air. It already cause many disaster to our beautiful earth. What is more, it caused deforestation and desertification. ("Livestock's Long Shadow", FAO). Our so called technology like Hormone, chemical fertilizer and pesticide also badly damage the body of the earth. So please encourage Organic Farming as well.

3. Meat eating is the leading cause of most disease. That is why for a rich country like America, "rich disease" rate is so high. (see "China Report", T.Colin Campbell, PhD)

4. Nowadays breeding way is quite cruel and inhuman. That is not the way that should happen in a "civilized society". Slave was liberated, Black was liberated, Women was liberated. Now it is time for animal.

Government is the most important and efficient role to lead people to know the fact and push positive movement. I wish you could make a better world with your faith and braveness.

Charles Darwin: There is almost no difference in mentalistic between human and advanced animals, low level animals feel happy and pain precisely, they have joy and sadness, just like we human do.

Albert Einstein: I think life style of vegetarianism has a tremendous positive effect on human characteristic in a natural way, it bring enormous benefits to mankind.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-28 02:41:39

No Duplicates.

## **Comment 377 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: carly

Last Name: martyn

Email Address: spiritoflife@lycos.co.uk

Affiliation:

Subject: why are you not actively promoting the vegetarian diet !

Comment:

A meat eater riding a bike leaves a bigger carbon footprint than a vegan driving a Hummer. Our best personal action is to adopt a vegan-vegetarian diet & lifestyle to address global warming. Google "Livestocks Long Shadow" & UN 2006 report "Cattle rearing worse for global warming than all automotive industries combined". DEFRA (UK) now suggests to the public to adopt a vegan diet. Green groups need stop ignoring this crucial issue and begin to educate the public the time for action is Now. For all sentient beings sake please actively promote this solution..

Thank you

God Bless us all with the wisdom and courage  
to make the right choices at this very important time  
in all our lifes.

we come with nothing into this world and we leave with nothing  
it would be nice when we look back from up above knowing that we  
played our little part in helping save this wonderful planet.  
So Lets all be a Hero and Go Veggie Go Green and Save this  
Planet!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-28 03:44:38

No Duplicates.

## **Comment 378 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Kathleen  
Last Name: Hogan  
Email Address: dublinquanyin@gmail.com  
Affiliation:

Subject: Climate Change - Global Warming  
Comment:

Dear CA legislators,

KOBE – Experts gathering for the Group of Eight environment ministers meeting in the city known for its high-quality beef have a suggestion on how to reduce greenhouse gas emissions: Eat less beef.

"One way to combat climate change is reducing meat consumption," said Ragendra Pachauri of the International Panel on Climate Change at a symposium Saturday, the opening day of the three-day climate meeting in Kobe.

A 2006 report by the U.N. Food and Agriculture Organization made clear the environmental costs of excessive beef consumption. Since then, both the U.N. and environmental nongovernmental organizations, including, not surprisingly, vegetarian groups, have touted the environmental as well as the health benefits of avoiding filet mignon and hamburgers.

According to the U.N. report, the livestock sector internationally generates 18 percent more greenhouse gas emissions, as measured in carbon dioxide equivalent, than the transport sector.

Furthermore, the livestock sector also damages the ecosystem, as it is a major contributor to land and water degradation. And the problem is expected to get worse. The U.N. noted that global meat production is projected to more than double from 229 million tons in 1999 to 465 million tons by 2050.

The livestock sector now uses 30 percent of the Earth's land surface. Most of the use consists of permanent pastures. But 33 percent of the global arable land is now used to produce livestock feed, the report said. One result is deforestation, as old-growth forests that absorb large amounts of carbon dioxide are cleared to create new grazing areas.

In Latin America, some 70 percent of forests in the Amazon region have been turned over to grazing, the U.N. said.

. . . .

Full Story on Japan Times:

<http://search.japantimes.co.jp/cgi-bin/nn20080526a2.html>

Please include Veganism/Vegetarianism and Organic Farming in your policies against global warming.

Thank you.

Yours sincerely

Kathleen Hogan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-28 03:51:08

No Duplicates.

**Comment 379 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jenny

Last Name: Ngai

Email Address: jngai30@hotmail.com

Affiliation:

Subject: Veganism/Vegetarianism and Organic Farming to tackle climate change

Comment:

Dear Legislators

I am proposing strongly for the CA legislators to include Veganism/Vegetarianism and Organic Farming to tackle climate change. As all evidence show, livestock industry contributes at least 18% of greenhouse gas emissions and scientists have showed that veganism/vegetarianism can halt at least 80% of carbon emissions. Please refer to the report "Livestock's Long Shadows" by the UN.

As global warming is now an urgent threat to the whole globe, I am encouraging the CA legislators to look at the above suggestions seriously. Your courageous decisions can save billions of people in this century.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-28 04:26:56

No Duplicates.

**Comment 380 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Yongbing  
Last Name: Wang  
Email Address: ywanggolden@yahoo.com  
Affiliation:

Subject: Veganism/Vegetarianism and Organic Farming  
Comment:

Dear Legislator:

In regard of global warming solution, vegetarianism/veganism and organic farming are the greatest solution. It helps people live a healthy, sustainable, and above all conscious and noble life. The government's action is critically important in leading our nation and people towards wise choices.

We thank you very much for your noble job.

Sincerely,

Sairy Wang

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-28 05:37:24

No Duplicates.

**Comment 381 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Andy

Last Name: Hamilton

Email Address: andy.hamilton@sdcounty.ca.gov

Affiliation: San Diego Air Pollution Control District

Subject: San Diego APCD Comments on Scoping Plan

Comment:

Attached are the comments of the San Diego County Air Pollution Control District on the Draft Scoping Plan, submitted by Director/Air Pollution Control Officer Bob Kard.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/618-sandiego\\_apcd\\_scopcomments\\_8-27-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/618-sandiego_apcd_scopcomments_8-27-08.pdf)

Original File Name: SanDiego APCD ScopComments 8-27-08.pdf

Date and Time Comment Was Submitted: 2008-08-28 09:11:59

No Duplicates.

**Comment 382 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: FENG

Last Name: ZHAOYANG

Email Address: fenglight@gmail.com

Affiliation:

Subject: Go Veg, Be Green.Save Our Plant!

Comment:

Go Veg, Be Green.Save Our Plant!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-28 17:16:09

No Duplicates.

**Comment 383 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Steve

Last Name: Gillette

Email Address: cseghers@arb.ca.gov

Affiliation: Capstone Turbine Corporation

Subject: AB 32 Draft Scoping Plan and Appendicies

Comment:

please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/620-8\\_22\\_08\\_capstone.pdf](http://www.arb.ca.gov/lists/sp-general-ws/620-8_22_08_capstone.pdf)

Original File Name: 8\_22\_08\_capstone.pdf

Date and Time Comment Was Submitted: 2008-08-29 11:28:20

No Duplicates.

**Comment 384 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Aaron  
Last Name: Green  
Email Address: aaron@vica.com  
Affiliation: Valley Industry & Commerce Association

Subject: Comments on AB 32 Scoping Plan  
Comment:

August 29, 2008

Ms. Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

SUBJECT: AB 32 Scoping Plan - Comments

Dear Chairwoman Nichols,

On behalf of the Valley Industry and Commerce Association (VICA), we are writing to submit our comments on the recently released AB 32 Scoping Plan. We compliment you and the staff of the California Air Resources Board (CARB) for the time and energy that you have spent on the composition of this important document.

VICA has discussed the plan with our members at length and has adopted a set of principles that we believe should be applied to the AB 32 Scoping Plan. These principles and policies are vital aspects of ensuring that the plan is both effective and equitable to all those impacted by the implementation of AB 32.

Enclosed is VICA's AB 32 Scoping Principles document. We request that you and your staff review the principles and incorporate them into the finalized plan. VICA looks forward to partnering with CARB as the implementation process of AB 32 moves forward.

Thank you for your time and consideration.

Sincerely,

Carolyn Casavan  
Environment & Energy Committee Co-Chair

Brendan L. Huffman  
President & CEO

(attached and below)

VICA AB 32 Scoping Principles:

Position: The Valley Industry and Commerce Association (VICA) supports the following principles and practices as they relate to

the AB 32 Scoping Plan (released on June 26, 2008):

1. The market mechanisms and fee structures in the Plan should be designed to return revenues to the sectors and regions from which they originate. The Plan should protect against the redistribution of wealth and should focus revenues on reducing emissions and emission reduction costs, encouraging technology development and providing alternatives.
2. The Plan should place more emphasis on public transportation and rail transport as a means of reducing greenhouse gas emissions from mobile sources, which account for nearly 40% of the emissions in the State.
3. Tax credits should be provided for investments in energy efficiency and renewable energy.
4. In a cap and trade system, VICA supports allocation of credits instead of auction, especially during the first 10 years of the program, to give producers time to implement changes.
5. Emissions reduction programs should be phased in gradually in an effort to allow producers to adjust to new mandates to avoid shocks to any particular market.
6. More incentive based measures should be included in the Plan to induce not only compliance, but also encourage producers to go beyond 2020 targets.
7. The Plan should acknowledge and provide some form of credit for early actions.
8. The Plan as currently proposed focuses primarily on stationary sources and business for achieving the targets. Emission reduction requirements should be applied to all sectors in proportion to their contribution to the State's inventory to avoid overburdening individual sectors.
9. The use of offsets for compliance should not be limited to 10%. Offsets provide cost-effective emissions reductions and encourage innovation in all sectors. All verified offsets should be allowed to be used for compliance.
10. The Air Resources Board should be the lead implementation agency for AB 32. The Plan should require that actions and programs developed by local or regional agencies are consistent with the State program and avoid duplication of effort.
11. When calculating cost effectiveness of a project, only greenhouse gas emissions should be used and not co-benefits. Including co-benefits in the cost-effectiveness calculations skews results and may end up favoring technologies with low greenhouse gas benefits.
12. Instead of imposing mandatory audits and controls, the plan should allow the market to decide how best to develop and implement the most productive and cost-effective means of reducing greenhouse emissions.
13. Projects that comply with AB 32 guidelines should not be required to do a separate CEQA review or be subject to additional

mitigation for greenhouse gases.

14. Eliminate the water sector public goods charge. This charge unfairly burdens urban water users and attempts to duplicate measures already being implemented by water providers.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/621-ab\\_32\\_scoping\\_principles.pdf](http://www.arb.ca.gov/lists/sp-general-ws/621-ab_32_scoping_principles.pdf)

Original File Name: AB 32 Scoping Principles.pdf

Date and Time Comment Was Submitted: 2008-08-29 13:23:24

No Duplicates.

## **Comment 385 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Khanhmei  
Last Name: Wong  
Email Address: kwmei@hotmail.com  
Affiliation:

Subject: Global Warming  
Comment:

As caring citizens of this great nation, we are deeply concerned about global warming and its consequences to our planet.

NASA scientists recently discovered that Arctic ice has been melting significantly more quickly than expected due to global warming. In fact, they predict that all Arctic ice could be gone by the summer of 2012 - a catastrophe beyond imagination.

It is now well accepted that the warming of our planet is a consequence of the greenhouse gases generated during various human activities. According to the United Nations Food and Agriculture Organization, the animal livestock industry is responsible for 18% of all greenhouse gas emissions. This is even higher than the greenhouse emissions from all forms of transportation combined!

Given this fact, one of the most effective solutions to the global warming crisis would be to reduce our consumption of meat. We feel that if more people understood the dire consequences of the meat based diet, they would be willing to make the sacrifices necessary for the common good. Reduction of meat consumption would also bring with it benefits to the environment as well as to the health of our citizens. People need to be informed of this! Of course, reduction of meat consumption is only one approach, and must be combined with efforts toward sustainable and renewable energy.

We urge that the U.S. Government seriously explore strategies and make effective policies toward preventing the worst scenario from happening in four years. Only in this way can this great nation, which has been such an influential world leader, continue to be a prosperous home for all the many generations to come. For more detailed information on global warming and greenhouse gases emitted by raising livestock, please read the enclosed reprint of "Rethinking the Meat-Guzzler" by Mark Bittman (January 27, 2008 New York Times). Thank you for your noble efforts to save mankind.

Sincerely yours,

Concerned Citizens  
Dr. Khanhmei Wong  
(www.suprememastertv.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-29 15:08:53

No Duplicates.

**Comment 386 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: ruby

Last Name: wang

Email Address: rubywang.happy@yahoo.com

Affiliation:

Subject: fastest way to save our planet

Comment:

Animal farming is the number 1 contributor of global warming, which is also the causes of many disease, such as heart disease, cancer, diabetes, cohn disease, osteoporosis, multiple schlerosis, and many more. Government should strongly suggest its citizen's to adopt eco-friendly diet - vegetarian diet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-29 15:33:38

No Duplicates.

**Comment 387 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Eve

Last Name: Feng

Email Address: feng\_yee@hotmail.com

Affiliation:

Subject: PLEASE INCLUDE VEGANISM/VEGETARIANISM

Comment:

CA legislators should really include Veganism/Vegetarianism and  
Organic Farming on your agenda against global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-30 13:40:46

No Duplicates.

**Comment 388 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ryan

Last Name: Bell

Email Address: ryan.bell@acgov.org

Affiliation: Alameda County

Subject: Comments from Alameda County and Sacramento County

Comment:

Attached are the comments on the AB32 Scoping Plan from Alameda and Sacramento Counties. Thank you for your consideration of these issues. Please feel free to contact us if to discuss any of these points further.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/625-  
comments\\_from\\_alameda\\_county\\_and\\_sacramento\\_county.pdf](http://www.arb.ca.gov/lists/sp-general-ws/625-comments_from_alameda_county_and_sacramento_county.pdf)

Original File Name: Comments from Alameda County and Sacramento County.pdf

Date and Time Comment Was Submitted: 2008-09-02 09:48:45

No Duplicates.

**Comment 389 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: C. Susie

Last Name: Berlin

Email Address: cseghers@arb.ca.gov

Affiliation: Northern California Power Agency

Subject: Appendecies

Comment:

Please see the attached comments

Attachment: [www.arb.ca.gov/lists/sp-general-ws/626-8\\_30\\_08\\_northerncaliforniapoweragency.pdf](http://www.arb.ca.gov/lists/sp-general-ws/626-8_30_08_northerncaliforniapoweragency.pdf)

Original File Name: 8\_30\_08\_NorthernCaliforniaPowerAgency.pdf

Date and Time Comment Was Submitted: 2008-09-02 10:53:07

No Duplicates.

**Comment 390 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ellie  
Last Name: Booth  
Email Address: ebooth@covantaenergy.com  
Affiliation: Covanta Energy

Subject: Comments on the Scoping Plan  
Comment:

Please accept the attached comments on Section C of the CARB  
Scoping Plan Appendices.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/627-covanta\\_energy\\_comments\\_final.doc](http://www.arb.ca.gov/lists/sp-general-ws/627-covanta_energy_comments_final.doc)

Original File Name: Covanta Energy comments final.doc

Date and Time Comment Was Submitted: 2008-09-02 11:25:49

No Duplicates.

**Comment 391 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Carolyn

Last Name: Casavan

Email Address: ccasavan@wcviro.com

Affiliation: West Coast Environmental and Engineering

Subject: Additional Suggestions for AB 32 Scoping Plan

Comment:

Attached is a comment letter with suggestions for additions to the Scoping Plan.

- o Proposed reporting for passenger vehicles
- o GHG emission reduction rating system
- o Public transportation and our transportation planning process.

The first and third of these suggestions have been submitted separately under Transportation.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/628-ab32\\_suggestions\\_8.29.08.doc](http://www.arb.ca.gov/lists/sp-general-ws/628-ab32_suggestions_8.29.08.doc)

Original File Name: AB32 Suggestions 8.29.08.doc

Date and Time Comment Was Submitted: 2008-09-02 12:19:13

No Duplicates.

**Comment 392 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jim  
Last Name: Yarbrough  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: Sustainable and local food systems reduce carbon emissions  
Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/629-8\\_01\\_08\\_wecallontheairresourcesboardformletter.pdf](http://www.arb.ca.gov/lists/sp-general-ws/629-8_01_08_wecallontheairresourcesboardformletter.pdf)

Original File Name: 8\_01\_08\_wecallontheairresourcesboardformletter.pdf

Date and Time Comment Was Submitted: 2008-09-02 14:23:27

No Duplicates.

**Comment 393 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ralph

Last Name: Moran

Email Address: cseghers@arb.ca.gov

Affiliation: BP America, Inc.

Subject: Climate Change Draft Scoping Plan

Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/630-8\\_14\\_08\\_bp.pdf](http://www.arb.ca.gov/lists/sp-general-ws/630-8_14_08_bp.pdf)

Original File Name: 8\_14\_08\_BP.pdf

Date and Time Comment Was Submitted: 2008-09-03 12:57:06

No Duplicates.

**Comment 394 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Randal

Last Name: Friedman

Email Address: Randal.Friedman@navy.mil

Affiliation: United States Navy/DoD

Subject: DoD Comment Letter

Comment:

Attached please find the military's comment letter on the Scoping  
Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/631-ab32\\_draft\\_scoping\\_dod\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/631-ab32_draft_scoping_dod_comments.pdf)

Original File Name: AB32 Draft Scoping DoD Comments.PDF

Date and Time Comment Was Submitted: 2008-09-03 15:42:27

No Duplicates.

## **Comment 395 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Amy

Last Name: Kyle

Email Address: [adkyle@berkeley.edu](mailto:adkyle@berkeley.edu)

Affiliation: University of California, Berkeley

Subject: Addressing Public Health in the AB 32 Scoping Plan

Comment:

Note that detailed comments are posted as a PDF attachment.

In June, the ARB released a draft scoping plan to identify and assess strategies to achieve the goals of AB 32. The scoping plan does not, however, consider public health when analyzing alternatives or assessing strategies.

By thinking about public health during design, ARB may be able to increase the net benefits to the people of the State and cost effectiveness overall. Major actions to reduce greenhouse emissions and transition to cleaner and more sustainable energy can produce health benefits.

The ARB could incorporate public health in seven areas:

1. Incorporate public health into policy objectives --  
The plan should consider advancement of public health in the analysis and selection of strategies. Public health benefits have considerable value. Strategies that also maximize health benefits could increase cost effectiveness because they achieve greater gains (more benefit per cost expended).
2. Focus on energy solutions as much as pollution control --  
The solutions to climate change depend as much on the creation of new energy and conservation technologies as on pollution control. These deserve more emphasis, particularly in terms of incentives.
3. Recognize the role of communities --  
The interrelated factors of community design, location of facilities and transportation, activity patterns, and quality of the built environment are decided at the local level and profoundly affect greenhouse emissions and public health.
4. Allocate resources to help adaptation to on-going change for the vulnerable --  
The plan should provide a way to allocate resources to help vulnerable communities and individuals adapt to change that is occurring.
5. Enhance and support the capacity of the people to take voluntary actions --  
The plan should consider how to empower and support individual, voluntary actions by people to reduce emissions and energy demand.

6. Emphasize post-combustion technologies --  
The plan should emphasize moving beyond combustion to adopt clean and sustainable renewable energy sources that avoid the emissions and health concerns inherent to combustion.

7. Provide assessment of "cap and trade" and other economic incentives --  
The plan should provide an assessment of public health issues embedded in choice of "cap and trade" strategies and their variants, compared to other approaches.

The initial suggestions herein could be developed further in consultation with experts and stakeholders in the relevant areas. Much is known about how to advance public health in the areas discussed here.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/632-addressing\\_public\\_health\\_in\\_ab\\_32.pdf](http://www.arb.ca.gov/lists/sp-general-ws/632-addressing_public_health_in_ab_32.pdf)

Original File Name: Addressing Public Health in AB 32.pdf

Date and Time Comment Was Submitted: 2008-09-04 09:52:00

No Duplicates.

**Comment 396 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ana

Last Name: Sandoval

Email Address: cseghers@arb.ca.gov

Affiliation: Bay Area Air Quality Management District

Subject: AB 32 Implementation

Comment:

Please see the attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/633-9\\_03\\_08\\_baaqmd.pdf](http://www.arb.ca.gov/lists/sp-general-ws/633-9_03_08_baaqmd.pdf)

Original File Name: 9\_03\_08\_BAAQMD.pdf

Date and Time Comment Was Submitted: 2008-09-05 14:45:50

No Duplicates.

**Comment 397 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Steve  
Last Name: Church  
Email Address: schurch@arb.ca.gov  
Affiliation: ETAAC

Subject: Climate Change Draft Scoping Plan  
Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/634-9\\_05\\_08\\_etaac.pdf](http://www.arb.ca.gov/lists/sp-general-ws/634-9_05_08_etaac.pdf)

Original File Name: 9\_05\_08\_ETAAC.pdf

Date and Time Comment Was Submitted: 2008-09-08 08:50:30

No Duplicates.

**Comment 398 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jim  
Last Name: Hawley  
Email Address: [jhawley@technet.org](mailto:jhawley@technet.org)  
Affiliation: TechNet

Subject: TechNet comments on AB 32 Scoping Plan and Appendices  
Comment:

Please find enclosed TechNet's comments on the AB 32 Scoping Plan  
and Appendices.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/635-ab\\_32\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/635-ab_32_scoping_plan_comments.pdf)

Original File Name: AB 32 Scoping Plan comments.pdf

Date and Time Comment Was Submitted: 2008-09-08 15:30:02

No Duplicates.

**Comment 399 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: zhang

Last Name: ming

Email Address: go\_home5@hotmail.com

Affiliation:

Subject: Go Veg

Comment:

Global warming is the biggest threat to our planet and all sentient beings in the earth now. It is tested that the noble way of living--Vegtarian is the key to cope with this kind of crisis. So, we all advocate that Go Veg,Be Green, To save our planet!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-10 06:11:14

No Duplicates.

**Comment 400 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Craig

Last Name: Tranby

Email Address: craig.tranby@lacity.org

Affiliation: City of Los Angeles

Subject: City of L.A. Comments on Appendices

Comment:

Please find attached the City's comments on the draft Scoping Plan Appendices which are in addition to the previously submitted comments on the draft Scoping Plan. Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/637-city\\_of\\_la\\_comments\\_on\\_scoping\\_plan\\_appendices.pdf](http://www.arb.ca.gov/lists/sp-general-ws/637-city_of_la_comments_on_scoping_plan_appendices.pdf)

Original File Name: City of LA comments on Scoping Plan appendices.pdf

Date and Time Comment Was Submitted: 2008-09-10 14:26:55

No Duplicates.

**Comment 401 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michael

Last Name: Aguirre

Email Address: cseghers@arb.ca.gov

Affiliation: City Attorney, City of San Diego

Subject: cap and trade

Comment:

please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/638-8\\_27\\_2008\\_sandiegocityattorney.pdf](http://www.arb.ca.gov/lists/sp-general-ws/638-8_27_2008_sandiegocityattorney.pdf)

Original File Name: 8\_27\_2008\_sandiegocityattorney.pdf

Date and Time Comment Was Submitted: 2008-09-10 14:52:46

No Duplicates.

## **Comment 402 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: louis  
Last Name: blumberg  
Email Address: lblumberg@tnc.org  
Affiliation: The Nature Conservancy

Subject: AB 32 cap and trade, distribution of allowances, funds for adaptation for natural resource

Comment:

am attempting to attach letter in Word format. seems problematic technically. will send by surface mail.

September 12, 2008

Mary Nichols, Chair  
California Air Resources Board  
1100 I Street  
Sacramento, CA 95814

Re: Principles for Climate Change Adaptation Funding for Fish and Wildlife and Their Habitats in the AB 32 Final Scoping Plan

Dear Mary:

Climate change poses an unprecedented threat to the future sustainability of human communities, fish and wildlife habitat, and the natural communities we depend upon for our food, our drinking water, recreational opportunities such as fishing, hunting, boating and hiking, the strength of our local economies, and our quality of life.

California's natural and human communities are already experiencing impacts from climate change. For example, recent research shows that climate change is threatening the survival of the Bay Checkerspot butterfly, the Desert bighorn sheep, California's iconic Joshua tree, the Pika, and many more species. Other research shows that we are already experiencing an increase in temperature and changes in the cycle of water. Scientists doing work in California predict that these and other impacts will increase in scale, scope, and magnitude. However, neither State nor Federal agencies have the resources they need to respond to the massive new threat of global warming. With major paradigm shifts in how our Federal and State agencies will need to manage land and water resources, additional funding to address the new threats on natural resources will be vital. Consistent with our earlier input, we are recommending that 20% of the revenue from an auction of allowances in the AB 32 cap and trade program be directed to helping natural resources adapt to climate change. While the state works to minimize impacts by maximizing reduction of emissions of greenhouse gases, California must simultaneously design, fund, and implement a comprehensive adaptation program to ensure that people, plants, animals, and fish survive the unavoidable impacts of climate change and that the natural

character of California that we pass on to future generations bears some resemblance to that we have enjoyed..

In the context of responding to climate change, the goal of adaptation is to reduce the risk of adverse environmental outcomes through activities that increase the resilience of ecological systems to climate change. Here, resilience refers to the amount of change or disturbance that a system can absorb without undergoing a fundamental shift to a different set of processes and structures. Fortunately, using forests and other natural resources to mitigate climate change by reducing or avoiding emissions and/or increasing sequestration, also produces companion benefits for climate change adaptation.

Following are a set of design strategies based on scientific principles for a natural resource climate change adaptation program for California connected to AB 32 implementation:

1. Dedicated Annual Funding Based on an Auction System. The cap-and-trade component of AB 32 implementation, and the companion WCI cap-and-trade should include an auction system for the distribution of emissions allowances, moving as quickly as possible to 100% of allowances auctioned. Proceeds from this auction system should be devoted to appropriate public interest purposes, including actions to address the harmful impacts of climate change on public health, infrastructure, community well-being, and the natural environment.

2. Auction Proceeds for Resilience-based Ecosystem Management and Protection. At least twenty percent (20%) of the proceeds from the cap-and-trade auction system should be dedicated to the resiliency of all ecosystems types, the ecological processes that support them, the associated habitats, and plants and fish and wildlife that are threatened by climate change. The program scope should include the full spectrum of ecosystems and habitats, including terrestrial, freshwater aquatic, estuarine, coastal, and marine. Development of adaptation strategies must include the promotion and protection of ecosystem services, supporting the critical role that these systems play in abating risk and enhancing resilience and protection of human and natural systems.

3. Broad Authority for Resilience-based Ecosystem Management and Protection Auction proceeds in the Final Scoping Plan should ensure dedicated funding for these purposes to help state, tribal and local resource agencies and their partners enhance the resilience of ecosystems at the system, habitat and species level, in the face of an altered and rapidly changing climate. Eligible activities should include land acquisition for habitat migration corridors and for buffer zones to protect lands, rivers, streams and estuaries; the protection of large intact landscapes; and restoration, planning, research, monitoring, education and land-owner assistance activities that are carried out pursuant to a comprehensive resiliency-based state adaptation strategy

4. Eligible Agencies. Agencies eligible for auction proceeds under the Final Scoping Plan are those state, tribal and local agencies and non-governmental organizations with authority and responsibility for maintaining the ecological health of protected lands, waters, plants, and fish and wildlife and their associated major habitats (forest, freshwater and coastal).

5. Inter Agency Coordinated State Strategy. To maximize effectiveness and efficiency, state, tribal and local resource agencies should collaborate and coordinate their actions through a

comprehensive state adaptation strategy and incorporate climate change adaptation considerations into existing planning processes and continuing programs to the fullest extent possible.

6. Federal Coordination. The activities of California's state, tribal and local resource agencies should be coordinated with priorities and programs developed by federal resource agencies pursuant to any national climate change adaptation strategy that is developed. By adopting a state adaptation strategy consistent with any federal guidelines, California will be well-positioned to capture funding that may pass through federal fish and wildlife agencies for state adaptation work.

7. Cost-Share Requirements. In order to ensure full and effective utilization of funds dedicated to fish and wildlife conservation under this program, states and other non-federal entities receiving auction proceeds for conservation actions should, where feasible, provide a relatively small cost-share payment toward those projects. This cost-share requirement should supersede any cost-share requirement in the program through which the adaptation strategy is delivered.

8. State Climate Change Ecosystem Assessment Research. The scientific capacity of the state resource agencies to evaluate and address the impacts of climate change on ecosystems and plants, fish and wildlife should be enhanced and coordinated. Capacity should be developed and enhanced through existing agency centers and resources such as the California Resources Agency and Cal EPA, and their various departments and divisions including the California Energy Commission and its Public Information Energy Research Program. Research, data and resources should be made publicly available for use by the academic, nonprofit, tribal and local communities to carry out additional research.

We appreciate your leadership on this matter and look forward to working with CARB on the implementation of AB 32.

Sincerely,

Louis Blumberg    Kim Delfino    Dan Taylor  
The Nature Conservancy    Defenders of Wildlife    Audubon California

cc: Lynn Terry  
Edie Chang  
Kevin Kennedy  
Robert Duvall

Attachment: [www.arb.ca.gov/lists/sp-general-ws/639-ab32\\_adaptation\\_-\\_tnc\\_aud\\_dw\\_final.doc](http://www.arb.ca.gov/lists/sp-general-ws/639-ab32_adaptation_-_tnc_aud_dw_final.doc)

Original File Name: AB32 Adaptation - TNC AUD DW final.doc

Date and Time Comment Was Submitted: 2008-09-12 14:02:19

No Duplicates.

**Comment 403 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kyle

Last Name: Boudreaux

Email Address: kyle\_boudreaux@fpl.com

Affiliation:

Subject: Comments on CARB Draft Scoping Plan

Comment:

The attached are the comments of FPL Energy Business Management to  
CARB's Draft Scoping Plan

Attachment: [www.arb.ca.gov/lists/sp-general-ws/640-  
fpl\\_energy\\_response\\_to\\_california\\_air\\_resources\\_board\\_draft\\_scoping\\_plan\\_and\\_appendices\\_fi  
nal.doc](http://www.arb.ca.gov/lists/sp-general-ws/640-fpl_energy_response_to_california_air_resources_board_draft_scoping_plan_and_appendices_final.doc)

Original File Name: FPL Energy Response to California Air Resources Board Draft Scoping  
Plan and Appendices final.doc

Date and Time Comment Was Submitted: 2008-09-12 14:02:41

No Duplicates.

**Comment 404 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kyle

Last Name: Boudreaux

Email Address: kyle\_boudreaux@fpl.com

Affiliation:

Subject: Comments to CARB Draft Scoping Plan and Appendices

Comment:

The attached .pdf is our response to CARB's Draft Scoping Plan and Appendices. If you have any questions, please feel free to contact us at any time. Please disregard our previous submission on 9/12 as there was an error in that document caused by software issues.

Thank you

Kyle Boudreaux

Attachment: [www.arb.ca.gov/lists/sp-general-ws/641-fplenergy\\_comments\\_to\\_carb\\_draft\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/641-fplenergy_comments_to_carb_draft_scoping_plan.pdf)

Original File Name: FPLEnergy Comments to CARB Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-09-12 14:25:15

No Duplicates.

**Comment 405 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: tri

Last Name: phan

Email Address: raiden4eva@hotmail.com

Affiliation:

Subject: Be Veg

Comment:

being a vegetarian is the fastest and most important way to prevent  
global warming. Land are being deforested to raise livestock and  
food for livestocks. Energy/water is wasted farming a meat diet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-14 17:47:35

No Duplicates.

**Comment 406 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Louis

Last Name: Blumberg

Email Address: lblumberg@tnc.org

Affiliation: The Nature Conservancy

Subject: AB32 Adaptation

Comment:

See attached comment letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/643-ab32\\_adaptation\\_tnc\\_aud\\_dw\\_final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/643-ab32_adaptation_tnc_aud_dw_final.pdf)

Original File Name: AB32 Adaptation TNC AUD DW final.pdf

Date and Time Comment Was Submitted: 2008-09-15 09:17:53

No Duplicates.

**Comment 407 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Stephen

Last Name: Finnegan

Email Address: cseghers@arb.ca.gov

Affiliation: Automobile Club of Southern California

Subject: AB 32 Scoping Plan and Appendices

Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/644-9\\_16\\_08\\_aaa.pdf](http://www.arb.ca.gov/lists/sp-general-ws/644-9_16_08_aaa.pdf)

Original File Name: 9\_16\_08\_AAA.pdf

Date and Time Comment Was Submitted: 2008-09-15 16:50:32

No Duplicates.

**Comment 408 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Carla

Last Name: Din

Email Address: [din@apolloalliance.org](mailto:din@apolloalliance.org)

Affiliation: California Apollo Alliance

Subject: Draft Scoping Plan

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/646-  
ca\\_apollo\\_alliance\\_comment\\_letter\\_to\\_carb\\_final.doc](http://www.arb.ca.gov/lists/sp-general-ws/646-ca_apollo_alliance_comment_letter_to_carb_final.doc)

Original File Name: CA\_Apollo\_Alliance\_Comment\_Letter\_to\_CARB FINAL.doc

Date and Time Comment Was Submitted: 2008-09-18 15:53:18

No Duplicates.

**Comment 409 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Dominic

Last Name: DiMare

Email Address: sharjer@lawpolicy.com

Affiliation: Alliance for Retail Energy Markets

Subject: Comments to the California Air Resources Board-AB 32

Comment:

On behalf of the Alliance for Retail Energy Markets, please find the attached comments regarding AB 32. If you have any questions regarding this document, please contact me at the number provided above.

Regards,

Dominic F. DiMare

Attachment: [www.arb.ca.gov/lists/sp-general-ws/647-arem\\_comments\\_to\\_carb\\_on\\_the\\_draft\\_scoping\\_-september\\_19.doc](http://www.arb.ca.gov/lists/sp-general-ws/647-arem_comments_to_carb_on_the_draft_scoping_-september_19.doc)

Original File Name: AReM Comments to CARB on the Draft Scoping -September 19.doc

Date and Time Comment Was Submitted: 2008-09-19 10:08:48

No Duplicates.

**Comment 410 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Tom

Last Name: Frantz

Email Address: ini@lightspeed.net

Affiliation: Association of Irritated Residents

Subject: general comments but Agriculture issues are the emphasis

Comment:

Cap and Trade will not be effective because market based mechanisms will quickly fall apart when they are this complex. Keep it simple. A carbon fee is needed and every heavy user of fossil fuel needs to be regulated including Agriculture or the whole scheme will fall apart.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/648-presentation\\_to\\_carb\\_and\\_public\\_on\\_ab\\_32.doc](http://www.arb.ca.gov/lists/sp-general-ws/648-presentation_to_carb_and_public_on_ab_32.doc)

Original File Name: Presentation to CARB and Public on AB 32.doc

Date and Time Comment Was Submitted: 2008-09-21 10:29:49

No Duplicates.

**Comment 411 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Christine  
Last Name: Seghers  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

ARB has received approximately 200 of the attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/649-9\\_17\\_08\\_formletter\\_iurgeyoutostrengthen.pdf](http://www.arb.ca.gov/lists/sp-general-ws/649-9_17_08_formletter_iurgeyoutostrengthen.pdf)

Original File Name: 9\_17\_08\_formletter\_Iurgeyoutostrengthen.pdf

Date and Time Comment Was Submitted: 2008-09-24 15:27:20

No Duplicates.

**Comment 412 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Donald

Last Name: Lee

Email Address: cseghers@arb.ca.gov

Affiliation: San Diego Sierra Club

Subject: AB 32 Draft Scoping Plan and Appendicies

Comment:

Please find the attached comment from the Global Warming Committee  
of the San Diego Sierra Club

Attachment: [www.arb.ca.gov/lists/sp-general-ws/650-9\\_15\\_08\\_globalwarmingcommittee.pdf](http://www.arb.ca.gov/lists/sp-general-ws/650-9_15_08_globalwarmingcommittee.pdf)

Original File Name: 9\_15\_08\_globalwarmingcommittee.pdf

Date and Time Comment Was Submitted: 2008-09-24 15:30:38

No Duplicates.

**Comment 413 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Avinash

Last Name: Kar

Email Address: akar@nrdc.org

Affiliation:

Subject: Support for Regulatory Measures for Petroleum Refineries and the Industrial Sector

Comment:

Attached please find comments of environmental, environmental justice, and health groups regarding regulatory measures in the scoping plan for refineries and the industrial sector.

Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/651-support\\_for\\_regulatory\\_measures\\_for\\_refineries\\_and\\_industrial\\_sector\\_9\\_24\\_08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/651-support_for_regulatory_measures_for_refineries_and_industrial_sector_9_24_08.pdf)

Original File Name: support for regulatory measures for refineries and industrial sector 9 24 08.pdf

Date and Time Comment Was Submitted: 2008-09-25 10:03:12

No Duplicates.

**Comment 414 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Avinash

Last Name: Kar

Email Address: akar@nrdc.org

Affiliation:

Subject: Updated Letter & Attachments Supporting Regulatory Measures for  
Refineries/Industrial Sec.

Comment:

Attached please find an updated version of the letter we submitted  
on September 24, with additional sign ons, as well as maps and  
tables with information about where refineries are located in  
California and the populations that they impact, as promised in  
the previous version of the letter.

Please let me know if you have any questions.

Thank you.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/652-carb\\_letter.zip](http://www.arb.ca.gov/lists/sp-general-ws/652-carb_letter.zip)

Original File Name: CARB Letter.zip

Date and Time Comment Was Submitted: 2008-09-26 14:27:27

No Duplicates.

## **Comment 415 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Nancy  
Last Name: Kim  
Email Address: nancykim7@gmail.com  
Affiliation:

Subject: California Global Warming  
Comment:

We need a well-designed cap-and-trade program.

Cap-and-trade puts an absolute limit on pollution from some of California's largest sources and guarantees the environmental results we need.

Our message: CARB should include as many sources as possible in a cap-and-trade system. We support CARB's preliminary thinking that 80% of California's global warming pollution would be under a cap-and-trade system by 2020.

#

We need an "Indirect Source Rule" (ISR) to control emissions from development projects.

What is an ISR? Developers measure indirect (mostly vehicle and energy use) pollution from construction and operation of projects and ensure that equivalent reductions occur so the project's impacts are limited.

Our message: CARB should require California's local air districts to develop ISRs to control emissions from new developments.

#

We need a new Renewable Portfolio Standard (RPS) to increase clean energy in our state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:40:36

458 Duplicates.

**Comment 416 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Amos

Last Name: Hobby

Email Address: akhphd@earthlink.net

Affiliation:

Subject: Global Warming

Comment:

Act responsibly and protect us.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:46:32

No Duplicates.

## **Comment 417 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Marguerite  
Last Name: Shuster  
Email Address: shuster@fuller.edu  
Affiliation:

Subject: Please support strong global warming action  
Comment:

Dear Ms. Nichols:

To protect California's future and to do our part with respect to global warming, we need to take strong and immediate action. I support the following steps:

1. We need a well-designed cap-and-trade program. CARB should include as many sources as possible in a cap-and-trade system. We support CARB's preliminary thinking that 80% of California's global warming pollution would be under a cap-and-trade system by 2020.
2. We need an "Indirect Source Rule" (ISR) to control emissions from development projects. CARB should require California's local air districts to develop ISRs to control emissions from new developments.
3. We need a new Renewable Portfolio Standard (RPS) to increase clean energy in our state. I support CARB's preliminary recommendation that the state immediately adopt a 33% RPS by 2020.

Thank you,  
Marguerite Shuster

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:46:50

No Duplicates.

**Comment 418 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lisa

Last Name: Thomas

Email Address: lisa.thomas@blueshieldca.com

Affiliation:

Subject: CA Global Warming

Comment:

As this state being one of the largest emitters of Green House gases of this country more needs to be done to drastically cut emissions NOW. The technology for a better way has been around for decades but was ignored in lieu of the pursuit of greed and corruption. Change must happen NOW, not 3 or 10 or 20 years from NOW if the beloved planet we live on is to continue to support us in a viable manner.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:46:54

No Duplicates.

**Comment 419 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jon  
Last Name: Anderholm  
Email Address: xunbio@hotmail.com  
Affiliation:

Subject: Immediate and Urgent Action Needed  
Comment:

Dear CARB,

For our health... the health of our environment... we are intricately connected....  
The Climate change is the most urgent most disastrous calamity facing our planet...  
California needs to lead the way... we're drying up...  
Nature is telling us to move ahead with climate protection ...  
All necessary measures need to be considered and taken...

Best, Jon Anderholm                      Cazadero, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:47:30

No Duplicates.

**Comment 420 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Chatham H  
Last Name: Forbes Jr  
Email Address: cforbes@dbcontrol.com  
Affiliation:

Subject: Global Warming  
Comment:

Please keep a strong environmental plan in place to ensure a clean healthy California and planet Earth. It is time that everyone be accountable for protecting the resources of the world we live in.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:47:57

No Duplicates.

**Comment 421 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Denise

Last Name: Glass

Email Address: riverwalkgsmd@msn.com

Affiliation:

Subject: Global warmng

Comment:

Do all that can be done to slow or global warming. This issue is larger than anything mankind has ever had to deal with. It could be the end of us if we do not do all that is possible. It is bigger than politics, or trade agreements, or money.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:50:01

No Duplicates.

**Comment 422 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joshua  
Last Name: Stein  
Email Address: joshuas@berkeley.edu  
Affiliation:

Subject: A.B, 32 Scoping Plan  
Comment:

To: The California Air Resources Board,

I urge you to make the development of renewable sources of energy  
as well as energy conservation the centerpieces of your blueprint  
for cutting global warming pollution.

thank you, Joshua Stein

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:51:12

No Duplicates.

**Comment 423 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lora  
Last Name: Lowe  
Email Address: lorawoodslowe@aol.com  
Affiliation: none

Subject: Energy Standards  
Comment:

\*\*Our current goal of 10% renewable energy by 2010 is contemptible. In the year Green Mountain was allowed (under "deregulation") to sell energy here they exceeded our present goal by about 30%. Since we're supposedly deregulated, why not allow them back? They came through for us as our present monopolies haven't.

We need cap & trade.

We need (an ISR) to control emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:52:01

No Duplicates.

**Comment 424 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Muriel  
Last Name: Zimmermann  
Email Address: mmzimm@yahoo.com  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

I want to share with you my concerns about the plans currently being drafted by CARB. My hope is that you will include these concerns:

Control emissions from development projects by requiring local air districts to develop Indrict Source Rules (ISRs).

Include in your cap and trade program as many sources as possible, reaching 80% of California's global warming pollution by 2020.

Increase clean energy by adopting a 33% renewable portfolio standard by 2020.

Thank you for considering my comments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:52:53

No Duplicates.

**Comment 425 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joanna

Last Name: Welch

Email Address: joannawelch@hotmail.com

Affiliation:

Subject: Global Warming

Comment:

California needs to take a lead in solving the effects of Global Warming. Since CA is basically a state that gets a lot of sunshine, every business and house should have solar pv's.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:53:06

No Duplicates.

**Comment 426 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: joyce

Last Name: banzhaf

Email Address: joycebanzhaf@yahoo.com

Affiliation:

Subject: Air quality/greenhouse gases

Comment:

Please keep the most stringent controls possible on air pollutants including greenhouse gasses. Arctic summer ice is expected to be gone in a few years, methane is venting there. There is little time. This is the top priority.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:54:31

No Duplicates.

**Comment 427 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: dave

Last Name: alexander

Email Address: dalexander3@raytheon.com

Affiliation:

Subject: Clean Air

Comment:

Please support the implementatin of A.B.32 Scoping Plan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:56:33

No Duplicates.

**Comment 428 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Scott

Last Name: Sandus

Email Address: s\_sandus@hotmail.com

Affiliation:

Subject: CLEAN POWER

Comment:

I urge you to set higher clean air standards for CA. I think the  
higher the better! We need to creat jobs in this industry and  
remove ourselves from the old way of doing things

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:56:35

No Duplicates.

**Comment 429 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Millie

Last Name: Barrett

Email Address: barrettranch@sbcglobal.net

Affiliation:

Subject: Global Warming

Comment:

Make a commitment to make California one of the leaders in the  
country to take firm action on global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:57:19

No Duplicates.

**Comment 430 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Charla

Last Name: Morgan

Email Address: charlamorgan@sbcglobal.net

Affiliation:

Subject: Stop Global Warming Actions in California

Comment:

Please do everything you can to make California a leader in using  
alternative, renewable energy--energy that does not result in  
global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:57:24

No Duplicates.

**Comment 431 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: carol  
Last Name: sangster  
Email Address: joasangster@sbcglobal.net  
Affiliation:

Subject: strong global warming action need in CA  
Comment:

Dear Ms. Nichols,

Please include in your AB 32 Scoping plan these important issues:

California needs a well designed cap and trade program.

California needs an indirect source rule to control emissions from development projects.

California needs a new renewable portfolio standard to increase clean energy in our state.

Thank-you for making California, and our planet, cleaner.

Carol Sangster

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 12:58:59

No Duplicates.

**Comment 432 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: James  
Last Name: Roberts  
Email Address: jamesrroberts@hotmail.com  
Affiliation:

Subject: Renewable Energy Plan  
Comment:

CA ARB,

I'd like to express my desire to see more renewable energy projects in California, new incentives for plug-in hybrid cars, tax incentives for solar power and wind power, and the political ability for the average taxpayer, not just super large energy corporations to create their own energy dependent to the ecoregion they live in.

Please make policy decisions that favor ecological sanity over money, and economic incentives in the direction of rewarding renewable energy use. Concomitantly, I'd like to see legislation carry forward that ultimately penalizes pollution, global warming carbon dioxide increasing technologies, and fiscal recklessness.

James R. Roberts

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:00:57

No Duplicates.

**Comment 433 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: rose

Last Name: henley

Email Address: shamusonyou@aol.com

Affiliation:

Subject: CLEAN AIR

Comment:

KEEP THE AIR CLEAN FOR ALL OF US!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:01:02

No Duplicates.

**Comment 434 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Donna

Last Name: Sharee

Email Address: dsharee@earthlink.net

Affiliation:

Subject: global warming

Comment:

Please support A.B. 32 Coping Plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:03:05

No Duplicates.

**Comment 435 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Carla

Last Name: Stern

Email Address: carlastern@yahoo.com

Affiliation:

Subject: Support Strong Global Warming Initiatives

Comment:

Please support strong California Global Warming initiatives. We desperately need to do all we can to immediately reverse the damage that we have done to our life supporting planet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:03:17

No Duplicates.

**Comment 436 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kirk

Last Name: Margo

Email Address: kirkmargo@hotmail.com

Affiliation:

Subject: 33% RPS

Comment:

Hello. I support the 33% RPS as recommended. Thank you > Kirk  
Margo

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:05:29

No Duplicates.

**Comment 437 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rayline

Last Name: Dean

Email Address: RaylineLDean@msn.com

Affiliation:

Subject: Need to keep air cleaned

Comment:

Need to keep the air cleaned

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:05:36

No Duplicates.

**Comment 438 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Susan

Last Name: Hathaway

Email Address: susanhathaway@earthlink.net

Affiliation:

Subject: Support strong global warming measures

Comment:

California needs strong measures to combat global warming, despite  
the federal government's determination to increase it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:09:35

No Duplicates.

## **Comment 439 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Loren  
Last Name: Amelang  
Email Address: loren@pacific.net  
Affiliation:

Subject: Thoughts from "Northwest Nowhere"

Comment:

I have two main points to make:

1. Cap-and-Trade is a great idea, but only so long as all allowances are sold at market rates. We must avoid Europe's initial mistake of handing out allowances for free in proportion to existing emissions. Start California's program by requiring emitters to purchase all their allowances!

2. Please don't forget those of us who live off-grid when energy incentives are designed. Most of the existing incentives are linked to displacing centralized utility power, and provide no assistance for off-grid energy. But in fact, there are hundreds of families out here in Mendocino, Humboldt, and other rural counties who run their own small, inefficient, and dirty private generators for hundreds of hours per year to supplement their solar or micro-hydro systems. That is undoubtedly some of the "dirtiest" power produced in the state, and should be a prime target for incentives!

Thank you for your consideration,

Loren

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:13:16

No Duplicates.

**Comment 440 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Madeleine  
Last Name: Fisher-Kern  
Email Address: metropet2000@yahoo.com  
Affiliation:

Subject: California acts and the nation follows  
Comment:

The state of California has been at the forefront of major and positive change continually. This is a time to do it again. Global Warming is a growing threat to all species living on this planet. It is time to act. It is time for corporate America to do more than plunder this planet for its shareholders. It is time for us all to be less apathetic and demand change that will alter the fate of this beautiful place we live.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:13:20

No Duplicates.

**Comment 441 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kaveh

Last Name: Rad

Email Address: kavrad@earthlink.net

Affiliation:

Subject: Global Warming

Comment:

Stop global warming! CA must act. Do not wait for the Feds to have  
ANY leadership on this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:14:22

No Duplicates.

**Comment 442 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joan

Last Name: Forman

Email Address: joanforman@earthlink.net

Affiliation:

Subject: global climate change cannot be ignored

Comment:

We cannot afford to ignore global climate change and the  
destruction of the environment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:16:11

No Duplicates.

**Comment 443 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Philip  
Last Name: Ratcliff  
Email Address: skazz999W@hotmail.com  
Affiliation:

Subject: A.B. 32 Scoping Plan  
Comment:

California needs to enact the tightest air pollution controls, because the federal government has done little. Time and again, the federal Environmental Protection Agency stalls, thwarts, and otherwise drops the ball on regulating air quality. Air quality is very important. The asthma rate in the San Joaquin Valley is unacceptable. I never thought of asthma as being serious, until I lived in the Central Valley for 11 years. Two young relatives of my fellow employees died as a result of asthma attacks. Perhaps the EPA will enforce air quality standards with the next administration. We cannot count on that, however, and the state must step up to the plate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:22:21

No Duplicates.

**Comment 444 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: penelope

Last Name: norton

Email Address: itzam@charter.net

Affiliation:

Subject: strong global warming bill

Comment:

strong global warming resolve bills

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:22:21

No Duplicates.

**Comment 445 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Susan

Last Name: Johnson

Email Address: writer818@aol.com

Affiliation:

Subject: A cleaner world, starting with California

Comment:

Now is the time to show the world what America is really capable of doing. The United States could be the leader in a sustainable earth by showing the world what is possible if we choose life over death, love more than hate, generosity more than greed, hope instead of fear, and possibilities rather than improbabilities. I hope that you will pass new bills such as cap and trade programs, control emissions from development projects, and a renewable portfolio standard, which will help to make a better and healthier planet and show the world that hope for our future can start right here in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:26:57

No Duplicates.

**Comment 446 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: yoshaany

Last Name: rahm

Email Address: yyrahm@sbcglobal.net

Affiliation:

Subject: A.B. Scoping Plan

Comment:

I strongly urge you to support the cap-and-trade regulations for California. These regulations would limit the pollution being emitted. Californians deserve a new Renewable Portfolio Standard, one way to do this is requiring local air districts to control emissions from new developments. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:27:26

No Duplicates.

**Comment 447 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rita  
Last Name: Vandenburg  
Email Address: brvanden@earthlink.net  
Affiliation:

Subject: Global Warming  
Comment:

We need a strong ;program to start reversing global warming. Thank  
you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:27:29

1 Duplicates.

**Comment 448 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Paul  
Last Name: Engstrom  
Email Address: pmengstrom@macreviewzone.com  
Affiliation:

Subject: Support alternative energy and reduce global warming  
Comment:

Please support more incentives toward more Electric Vehicles and  
Plug-in Hybrid cars

Increase incentives for solar, wind and other alternative energy  
resources.

Thank you

Paul Engstrom  
Los Altos Ca 94022

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:28:16

No Duplicates.

**Comment 449 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gregory

Last Name: Alper

Email Address: ga.one@verizon.net

Affiliation:

Subject: Protect CA. air quality and fight global warning

Comment:

Protect CA. air quality and fight global warning

thx

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:32:04

No Duplicates.

**Comment 450 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jacques  
Last Name: Couture  
Email Address: jacques@asymtech.com  
Affiliation:

Subject: Renewable Energy  
Comment:

Our quality of life and the Worlds rests on human energy management  
and consumption.  
I am extremely encouraged by the A.B. 32 as it appears to be a  
step in the right direction.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:39:22

No Duplicates.

## **Comment 451 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Stephen

Last Name: Pew

Email Address: paradigmshift@lovebeing.org

Affiliation:

Subject: Please implement strong global warming rules

Comment:

The following will move us strongly forward:

- 1) Include as many sources as possible in any cap-and-trade system.
- 2) Add a carbon tax.
- 3) Require local air districts to develop indirect source rules to control carbon emissions from new developments.
- 4) Increase the renewable portfolio standard way beyond 10% by 2010. Make it 20% by 2010, 50% by 2015, and 80% by 2020. Yes, global warming is THAT serious.
- 5) Tighten up auto pollution, and bring back the ZEV mandate. Enforce a nontrivial ZEV mandate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:43:55

No Duplicates.

**Comment 452 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michael

Last Name: Mauer

Email Address: mdmauer1@aol.com

Affiliation:

Subject: Global Warming

Comment:

There is no greater threat to the future of our planet than human induced global warming. The major contributor to this is clearly greenhouse gases (although there are other factors, notably heat sinks such as pavement, structures, etc.). I hope that California will continue to provide leadership, action, and ideas to the rest of the nation and world.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:46:22

No Duplicates.

**Comment 453 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Bob  
Last Name: Faulkner  
Email Address: JustBob@Me.com  
Affiliation:

Subject: Global warming rules...  
Comment:

Hello,

I am writing to urge you to adopt the strong rules we need to  
fight global warming.

Thank you,

Bob Faulkner  
Santa Barbara, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:48:17

No Duplicates.

**Comment 454 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Linda

Last Name: Foster

Email Address: fosterstudio@sbcglobal.net

Affiliation:

Subject: Stopping Our Contribution to Climate Change

Comment:

Please make sure that California does everything it can to promote alternative energy sources and holds at bay any activities that could or would add to global warming or climate change. We need as much proactive effort in this direction as we can possibly muster. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:48:47

No Duplicates.

**Comment 455 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Rosemary  
Last Name: Graham-Gardner  
Email Address: liaisonsus@aol.com  
Affiliation:

Subject: Global warming  
Comment:

We must do all we can with the means we have and our might to do something about pending environmental disaster.  
The World will go on and the Planet will still be there, but we will long be gone and planet earth will take a while to heal itself.  
We must not let that happen. Not on our watch!

Attachment: [www.arb.ca.gov/lists/sp-general-ws/818-img\\_1099.jpg](http://www.arb.ca.gov/lists/sp-general-ws/818-img_1099.jpg)

Original File Name: IMG\_1099.JPG

Date and Time Comment Was Submitted: 2008-09-29 13:49:01

No Duplicates.

**Comment 456 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Brian

Last Name: Flores

Email Address: helosurfer@yahoo.com

Affiliation:

Subject: Cleaning up Californias Air

Comment:

I believe that C.A.R.B. was on the right track a few years back when they were proposing a mandate for automakers in California to produce an certain % of their cars to be zero emissions. We need to get back on track with this and hold the companies responsible becuae they can and have built electric cars that meet the commuting requirements of 90% of the population. We cannot let people to be bought out at the head of C.A.R.B. was buy putting him into a position of power in the Hydrogen Technologies board. This is a fallacy. It has been for years. We need to utilize the technology we have now and all of the car manufacturers proved that they can do it. We just need to pass law now to force them to allow consumers to these innovative new products. Please...for the economy, the air, and the health of the people!

If you haven't seen Who Killed the Electric Car please go and rent it now!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:49:55

No Duplicates.

**Comment 457 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mike  
Last Name: Kellogg  
Email Address: michael.kellogg@intel.com  
Affiliation:

Subject: TO: Mary Nichols  
Comment:

HI -- plz ensure EDF's top priorities are included in the A.B. 32  
Scoping Plan...

Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:51:51

No Duplicates.

**Comment 458 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kai

Last Name: Hally-Rosendahl

Email Address: khallyro@gmail.com

Affiliation:

Subject: Global Warming ACTION NEEDED NOW!

Comment:

Action needs to be taken to curb the anthropogenic causes of global warming. Not next month, next year, or next decade... NOW!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:52:27

No Duplicates.

**Comment 459 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: renee

Last Name: milburn

Email Address: rmilbu@yahoo.com

Affiliation:

Subject: Global Warming

Comment:

Please do what you can to hault global warming. I am very worried.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:56:06

No Duplicates.

**Comment 460 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: louis

Last Name: Fox

Email Address: louis@freerangestudios.com

Affiliation:

Subject: Please keep california the leader is solving global warming!

Comment:

Dear Mary Nichols,

I'm writng because I'm concerned about the A.B 32 scoping plan.  
I want to be sure that it's truly ground breaking and as strong as  
we need it to be.

We need a new Renewable Portfolio Standard to increase clean  
energy in our state, we need an "Indirect Source Rule" to control  
emissions from development projects and we need a well-designed  
cap-and-trade program.

Thank you for listening and doing the right thing,  
there's no time to mess around,

Louis Fox

Berkeley, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:59:21

No Duplicates.

**Comment 461 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Johanna

Last Name: Sandev

Email Address: johannaf@sonic.net

Affiliation:

Subject: Global Warming Measure

Comment:

Global warming is the most important issue of our time. There is no other issue with such far reaching consequences as global warming that is not held in check before it destroys our world.

California has already taken steps to be in the forefront of this issue but there is more to be done to set California apart as a leader.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 13:59:29

No Duplicates.

**Comment 462 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: frank

Last Name: Calabrese

Email Address: fjcalabrese@charter.net

Affiliation:

Subject: Global warming

Comment:

It appears to be a fact, but it doesn't come from any one source. Dairy Farms in the Central Valley give up methane, which is a greenhouse gas, but the dairies are Not the only contributors. They are trying to curb methane release and generate electricity and heat to use and send on to the grid. Two major North-South highways (5 & 99) and a busy rail route also add to the air pollution. They aren't resident sources, but mobile as they move through. As I understand things, diesel smog prevention is being enforced in engines over a certain size on farms. Landfills and garbage dumps emit methane which can be captured and used as fuel to reduce greenhouse gases and function in an alternative fuel reality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:00:25

No Duplicates.

**Comment 463 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: John  
Last Name: Zimmermann  
Email Address: zwordsmith@earthlink.net  
Affiliation:

Subject: Global Warming in California  
Comment:

Ladies and Gentlemen: Our state has long led the nation in environmental action, and this is no time to abandon that position. We need to do whatever we can to reign in the carbon emissions from our vehicles, factories and homes, while at the same time promoting viable alternative energy solutions through improvements to existing "green" technology and investment in new forms of alternative energy production. Please see that the opportunity being presented us to secure our future in a less pollutive way is not squandered. Thank you.

John Zimmermann, Long Beach

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:01:56

No Duplicates.

**Comment 464 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: lacey  
Last Name: white  
Email Address: whiteboi8767@aol.com  
Affiliation:

Subject: please  
Comment:

please let's all join for the fight against global warming and live  
in a better  
environment!!

Attachment: [www.arb.ca.gov/lists/sp-general-ws/839-global\\_warming.doc](http://www.arb.ca.gov/lists/sp-general-ws/839-global_warming.doc)

Original File Name: global Warming.doc

Date and Time Comment Was Submitted: 2008-09-29 14:02:33

No Duplicates.

**Comment 465 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Maryfrances

Last Name: Careccia

Email Address: mfc1206@yahoo.com

Affiliation:

Subject: SAVE OUR PLANET!!

Comment:

PROTECT OUR PLANET!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:13:48

No Duplicates.

**Comment 466 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Tom

Last Name: Burt

Email Address: sunpacificsolar@cox.net

Affiliation:

Subject: Global Warming needs to be stopped!

Comment:

It is time to get serious about global warming in California! We  
have the answers, we need action!

Thank you,

The Burt Family

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:17:26

No Duplicates.

**Comment 467 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: ANDY

Last Name: LUPENKO

Email Address: FCCSD@SBCGLOBAL.NET

Affiliation:

Subject: A.B. 32 SCOPING PLAN

Comment:

CALIFORNIA AND THE NATION NEED TO INCREASE THE USE OF RENEWABLE ENERGY AND REDUCE OUR CARBON FOOTPRINT. WE NEED TO EXPAND OUR USE OF WIND AND SOLAR ENERGY, ESPECIALLY ON A LOCAL LEVEL, WITH SOLAR ARRAYS ON THE MAJORITY OF OUR LOCAL STRUCTURES. WE NEED TO REALIZE THAT NUCLEAR ENERGY IS NEITHER COST EFFECTIVE NOR GREEN AND STOP THE PRODUCTION AND ACCUMULATION OF DEADLY SPENT NUCLEAR FUEL ALONG WITH THE DEVASTATION AND DESTRUCTION CAUSE BY THE MINING AND PROCESSING OF THE FUEL IN THE FIRST PLACE. PLEASE HELP CALIFORNIA AND THE NATION MOVE FORWARD TOWARDS A SUSTAINABLE, HEALTHY FUTURE.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:19:28

No Duplicates.

**Comment 468 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Art

Last Name: Cooley

Email Address: apcooley1@san.rr.com

Affiliation: Environmental Defense Fund

Subject: AB32

Comment:

Dear Mary: The Environmental Defense Fund has worked for 20 years to reduce global warming. Beginning with a joint exhibit with the American Museum of Natural History that opened in NY and later toured the country with a stop in San Diego, we have worked tirelessly for a cap and trade program. We pioneered a cap and trade program for acid rain that was signed into law by George Bush the first in 1990 in the amendments to the Clean Air Act. Its objective of reducing acid rain pollutants by 50% has been met. A similar cap and trade program is in effect in China, a result of EDF's effort. And, now the states are leading the country. EDF helped pass AB32 and support the effort to implement it. We are getting closer to success. As a founding trustee of EDF, I want to congratulate you on your efforts and wish you and EDF success in leading on this vitally important issue. Warmest regards, Art Cooley

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:20:04

No Duplicates.

**Comment 469 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Hailley

Last Name: Shepard

Email Address: hhoward@bendbroadband.com

Affiliation:

Subject: HELP

Comment:

With things are the way they are right now there is really only one thing we can rely on: have a home on planet Earth. However, if we don't preserve this precious planet we cannot guarantee a safe home for our children, or maybe even ourselves. There is nothing more important than saving this planet. We must act NOW!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:25:49

No Duplicates.

**Comment 470 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Charles

Last Name: Reed

Email Address: cmreed654@socal.rr.com

Affiliation:

Subject: Air Pollution

Comment:

Please adopt the strongest possible regulations regarding air  
pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:26:57

No Duplicates.

**Comment 471 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David  
Last Name: Sabbas  
Email Address: davedka@cox.net  
Affiliation:

Subject: Global Warming  
Comment:

You..Our Leaders Must administer and punish the True Major  
Polluters in this state...Force them to CLEAN UP..Lower their  
emmissions.....Support Renewable Sustainable forms of Energy  
Production:such as Wind..Solar...Geo/Volcanic  
Heat...BioMass....Please Fund these Programs,,,,,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:29:18

No Duplicates.

**Comment 472 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sherry  
Last Name: Marsh  
Email Address: MTASJ@aol.com  
Affiliation: democrat

Subject: global warming  
Comment:

I urge you to take strong global warming action.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:30:48

No Duplicates.

**Comment 473 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: JOEL

Last Name: THAMES

Email Address: jetames@sbcglobal.net

Affiliation:

Subject: STOP GLOBAL WARMING!

Comment:

STOP GLOBAL WARMING! CLEAN AIR NOW!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:35:28

No Duplicates.

**Comment 474 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Melynnique  
Last Name: Seabrook  
Email Address: eseabrook@aol.com  
Affiliation:

Subject: Keep California going forward on global warming, etc.  
Comment:

Honorable Mary Nichols:

We, as residents of California, are depended on the Air Resources Board protecting the environment we have to live in. Please do whatever you can to lower polution and encourage renewable energy development. Our very existence on planet earth depends on this!

Thank you!

Melynnique Seabrook  
Escondido, California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 14:54:19

No Duplicates.

**Comment 475 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ronald  
Last Name: MacQuarrie  
Email Address: scsurfer@cox.net  
Affiliation:

Subject: Air quality in California  
Comment:

I seems more obvious all of the time that California cannot wait for the national government to lead the way in air quality simply because is more urgent here, and because we need to get it done. California and ARB have always lead the way with this anyway. Please put this at the top of your agenda.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:03:47

No Duplicates.

**Comment 476 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Stan

Last Name: Banos

Email Address: stanco55@sbcglobal.net

Affiliation:

Subject: SP-General-WS

Comment:

The time to act was decades ago!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:05:15

No Duplicates.

## **Comment 477 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Eben  
Last Name: Rosenberger  
Email Address: ebenbrooks@ebenbrooks.com  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

Dear Ms. Nichols,

I am excited to hear that CARB will be releasing the AB 32 Scoping Plan next week. I am writing to urge you to include a few points that are very important to me and to a great number of Californians:

1) We need a well-designed cap-and-trade program. Cap-and-trade puts an absolute limit on pollution from some of California's largest sources and guarantees the environmental results we need. CARB should include as many sources as possible in a cap-and-trade system. 80% of California's global warming pollution would be under a cap-and-trade system by 2020.

2. We need an "Indirect Source Rule" (ISR) to control emissions from development projects. Developers must measure indirect (mostly vehicle and energy use) pollution from construction and operation of projects and ensure that equivalent reductions occur so the project's impacts are limited. CARB should require California's local air districts to develop ISRs to control emissions from new developments.

3. We need a new Renewable Portfolio Standard (RPS) to increase clean energy in our state. California's current RPS target is 10% by 2010. CARB should recommend that the state immediately adopt a 33% RPS by 2020.

Thank you, and I look forward to seeing the Scoping Plan when it is released.

Sincerely,  
Eben Brooks Rosenberger

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:12:36

653 Duplicates.

**Comment 478 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mary

Last Name: Baker

Email Address: mhoneyb@yahoo.com

Affiliation: Environmental Defense, Earth Justice,NWF

Subject: Saving Our Environment!!

Comment:

Please help with the cap and trade program, to put limit on the  
pollution. Governor Schwazenegger is doing a great job, but he  
needs help to control the emissions with renewable sources from  
(solar, wind,biomass,etc).

Thank you for your time.

M.Baker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:23:49

No Duplicates.

**Comment 479 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: William

Last Name: Manners

Email Address: williammanners@sbcglobal.net

Affiliation:

Subject: Environment & Energy

Comment:

Greenhouse Gasses are the major contributor to Global Warming. To combat these gasses we need to develop alternative sources of energy.

Let us move in a direction that does not require the burning of fossil fuels. This is America! We are innovators! We can create the mechanisms that are going to become necessary at some point in our future anyway. If we create them now, we can become the World Leader that America once was again. If we create and patent those technologies, we can export our goods again instead of exporting our jobs.

If other countries develop and patent those technologies we will be reduced to a third world country, a consumer nation, as we are now. We need to manufacture our own goods and stop buying everything from China!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:24:39

No Duplicates.

**Comment 480 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lauri  
Last Name: Provencher  
Email Address: noelp71@earthlink.net  
Affiliation:

Subject: clean air !

Comment:

You know that all us critters, large and small, of every persuasion, needs to be able to breathe clean and healthful air.

So, whyt do you insist in putting the importance of dollars ahead of the obvious.

Do your duty. Make it right.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:30:32

No Duplicates.

**Comment 481 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jon Warren

Last Name: Lentz

Email Address: free3speak@jonwarrenlentz.com

Affiliation:

Subject: Global Climate Change & Environmental Degradation

Comment:

It's time we started to take responsibility for our actions so that  
our children will have a habitable planet in which to rear our  
grandchildren.

Otherwise, we have made death or way of life.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:41:25

No Duplicates.

**Comment 482 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: judith

Last Name: seton

Email Address: judithandrobot@comcast.net

Affiliation:

Subject: global warming is the most urgent issue of our time

Comment:

DO EVERYTHING NOW

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:42:12

No Duplicates.

**Comment 483 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: JUdd

Last Name: Williams

Email Address: juddwill@pacbell.net

Affiliation:

Subject: A.B 32 Scoping Plan

Comment:

There are urgent things and important things. The most important thing is our earth as it relates to human habitation. Global warming won't wait for political urgency, it just follows the science of chemistry, physics, and meteorology.

We don't need to wait either. We can do important work. You can influence a positive direction for California, and I hope you will do everything you can as early a possible. That way your efforts will produce far greater impact.

The failure of CARB in the electric vehicle mandate is old news but the relentless and well funded interests are still well aware that CARB can do real work and make progress that they will profit less from allowing.

So take heart, do good work, and get some laws on the books ASAP;

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 15:49:45

No Duplicates.

**Comment 484 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Eileen  
Last Name: Heaser  
Email Address: eheaser@csus.edu  
Affiliation: CSUS Library

Subject: climate change  
Comment:

Alternative energy sources, much more emphasis on SOLAR is needed.

Faster and better control of emissions.

Thank-you.

E. Heaser

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 16:14:08

No Duplicates.

**Comment 485 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Dylan

Last Name: Forer

Email Address: Dforer@hotmail.com

Affiliation:

Subject: Alternative energy

Comment:

Please get this bill passed!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 16:30:40

No Duplicates.

**Comment 486 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: bonnie

Last Name: jay

Email Address: bonnie@estabird.com

Affiliation:

Subject: California Zero Emission Vehicle Regulation

Comment:

Do it.

There's no reason not to.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 16:49:30

No Duplicates.

**Comment 487 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Andrea  
Last Name: Bonnett  
Email Address: aesabet@aol.com  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

I strongly urge you to include the EDF's top priorities in your  
AB32 Scoping Plan.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 16:55:50

No Duplicates.

**Comment 488 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Emily  
Last Name: Kehmeier  
Email Address: birdybuddy1@yahoo.com  
Affiliation:

Subject: Global Warming  
Comment:

Please start a cap and trade program in California. Please make it necessary that a significant percentage of California's energy must come from renewable resources. Lat'y, please control the amount that big companies pollute.

All this would contribute to a healthier planet for my generation and the ones to come.

Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 16:55:53

No Duplicates.

**Comment 489 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: James  
Last Name: Hopkins  
Email Address: skymail4@aol.com  
Affiliation: Californians for Population Stabilizatio

Subject: Cleaning The Air  
Comment:

Working toward cleaning the air is a lost cause unless at the same  
time we also work toward controlling the human population. The  
largest source of population growth in the United States is  
illegal immigration.

-- James Hopkins  
[http://www.cosmosmith.com/human\\_population\\_crisis.htm](http://www.cosmosmith.com/human_population_crisis.htm)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 16:56:11

No Duplicates.

**Comment 490 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gail

Last Name: Sabbadini

Email Address: gsabbad@sciences.sdsu.edu

Affiliation:

Subject: Global Warming

Comment:

Please help decrease global warming in California by increasing awareness of individual responsibility to conserve energy, by increasing the requirements for wind and solar power generation, and by educating our populace on the indirect sources of greenhouse gasses emissions. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 16:57:44

No Duplicates.

**Comment 491 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: barbara

Last Name: Papa

Email Address: babspapa@hotmail.com

Affiliation:

Subject: Cut our global warming pollution in Calif

Comment:

Please cut our global warming pollution. Think of future generations. Please protect our planet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 17:00:06

No Duplicates.

**Comment 492 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Venta

Last Name: Leon

Email Address: venta.leon@gmail.com

Affiliation:

Subject: energy solutions

Comment:

We can't drill our way out of the energy mess. We must decrease our dependence on oil PERIOD, foreign or domestic. We need to overhaul our lifestyles to reduce per capita energy use regardless of the source, build intelligently, create a comfortable, safe, efficient and cheap public transportation system, and develop really smart, sustainable, clean sources for the energy we really need.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 17:14:10

No Duplicates.

**Comment 493 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ellen

Last Name: Koivisto

Email Address: offstage@earthlink.net

Affiliation:

Subject: A.B. 32 Scoping Plan

Comment:

This is a bare minimum baby-step beginning of what needs to be done RIGHT NOW or we may not survive. Really. That's what all the science is saying, and it's what we're starting to see.

In terms of A.B. 32, ISRs needs to be established for every air quality district, effective immediately. We obviously need a renewable portfolio standard for our state's energy. And we need aggressive action on cutting carbon emissions-- more than a cap and trade plan we need caps -- absolute, draconian caps.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 17:17:32

No Duplicates.

**Comment 494 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Bradley A  
Last Name: TePaske  
Email Address: drbatp@earthlink.net  
Affiliation:

Subject: RE: THE PRIVILEGE OF EXISTING AS A SPECIES.  
Comment:

WE ARE FIGHTING FOR NOTHING LESS THAN THE CONTINUITY OF OUR  
EXISTENCE AS A SPECIES!

QUESTIONS?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 17:20:49

No Duplicates.

**Comment 495 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Carolyn  
Last Name: Radlo  
Email Address: cradlo@earthlink.net  
Affiliation:

Subject: Scoping Plan  
Comment:

I urge you to draft a plan that is as stringent as possible with strict regulations restricting construction emissions and a goal of 30 if not 50% state energy from clean and renewable sources by 2020 at the latest. It can be done!  
Let this be an emergency plan - for that is what we face, a global emergency.

Thank you for your efforts to do the right thing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 17:20:51

No Duplicates.

**Comment 496 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: kieren

Last Name: van den blink

Email Address: kierenv@gmail.com

Affiliation:

Subject: please protect our environment.

Comment:

thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 17:32:23

No Duplicates.

**Comment 497 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Arthur  
Last Name: Gribben  
Email Address: piercerel@hotmail.com  
Affiliation:

Subject: CA Air  
Comment:

Without the basic ingredient for life that we call air, there can be nothing else. That's NOTHING. Do the right thing and work up policies and regulations that support life on all fronts. If we can breathe healthy air, all else will follow, even monetary profit!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 17:38:34

No Duplicates.

**Comment 498 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: john

Last Name: oda

Email Address: jandjoda@aol.com

Affiliation:

Subject: global warming

Comment:

I demand strong action on global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 18:09:02

No Duplicates.

**Comment 499 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Ian

Last Name: Gimple

Email Address: sotb@rocketmail.com

Affiliation:

Subject: Urging you to implement the recommendations

Comment:

I am writing to urge you to implement the strict recommendations of the Environment Defense Fund. California is the most populous state and needs to lead the way into a cleaner and more prosperous future for the state and the rest of the country.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 18:16:32

No Duplicates.

**Comment 500 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Terry Ellen  
Last Name: Robinson  
Email Address: robintevg@yahoo.com  
Affiliation:

Subject: A.B. 32 Scoping Plan  
Comment:

To the California Air Resources Board (CARB)

TO: Chair Clair Nichols  
RE: A.B. 32 Scoping Plan

There are already signs of ice melting earlier than predicted. So we need to get the Scoping Plan in to considered action. And California is on the road to attacking global warming now.

Here are some action points that I feel must be designed as to allow easy execution and easily measured reductions while lowering our global warming.

1)We need a well-designed cap-and-trade program.

2)We need an "Indirect Source Rule" (ISR) to control emissions from development projects.

3)Our message: We support CARB's preliminary recommendation that the state immediately adopt a 33% RPS by 2020.

Please put these points into action.Thank you for your attention.

Yours truly,

Ms. Terry Ellen Robinson  
Los Angeles, CA 90034

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 18:19:58

No Duplicates.

**Comment 501 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Connie

Last Name: Crusha

Email Address: holisticgardener@hotmail.com

Affiliation:

Subject: Let us lead the way!

Comment:

We need to be the leaders in stopping and reversing global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 18:29:06

No Duplicates.

**Comment 502 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Val

Last Name: Sanfilippo

Email Address: sanfiv@yahoo.com

Affiliation:

Subject: California Cooling

Comment:

Please stop the SDGE Powerlink-Liquid Natural Gas pipeline and  
dirty freighters from Indonesia.  
Please require SDGE to put solar panels on every customer's home  
in Southern California.  
Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 18:33:18

No Duplicates.

**Comment 503 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joseph  
Last Name: Hardin  
Email Address: joehardin@earthlink.net  
Affiliation:

Subject: Renewable energy  
Comment:

Please support renewable energy...  
Thank you,  
Joe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 18:38:23

No Duplicates.

**Comment 504 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Steve  
Last Name: Pisani  
Email Address: spisani@runbox.com  
Affiliation: Independent

Subject: Wind Power for California  
Comment:

Clean, cheap, reliable power comes best from windmills. Use them.  
Subsidize building more of them. Tax fossil fuels in order to pay  
for them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 18:54:34

No Duplicates.

**Comment 505 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Cyril & Ingrid  
Last Name: Bouteille  
Email Address: CyrilBouteille@yahoo.com  
Affiliation:

Subject: Carbon tax  
Comment:

Please do consider putting in place a carbon tax which increases year over year as way to slowly curb global warming. This will bring much needed funds to the state and will be more effective than a cap&trade program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 19:06:47

No Duplicates.

**Comment 506 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Terry

Last Name: Peterson

Email Address: t\_a\_peterson\_2000@yahoo.com

Affiliation:

Subject: Climate change

Comment:

Take climate change seriously and act accordingly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 19:12:22

No Duplicates.

## **Comment 507 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Rudy  
Last Name: Stefenel  
Email Address: rudystefenel@yahoo.com  
Affiliation: Democrat

Subject: Support Green Vehicles

Comment:

It is important to support and encourage people are leading the effort so switch to alternate fuel vehicles and green vehicles.

Here are suggestions:

Give a vehicle tax break to everyone who has a vehicle that gets more than 40 MPG. I suggest giving them \$150 dollar off their vehicle registration fee each year too.

Subsidize biodiesel. There are producers but the expenses of producing biodiesel is a problem. We need encourage more producers.

Also, give tax breaks to people who are creating biodiesel at home. One way is charge no sales tax on equipment for making biodiesel, both commercially and at home.

Don't charge road tax for biodiesel for 10 years to get more vehicles using this stuff.

Support waste vegetable oil diesel automobile conversions. These vehicles are much cleaner than gas and diesel vehicles, and comparable to biodiesel vehicles in the pollutants produced.

Also, most rendering companies sell the waste vegetable oil to companies that use it to make cattle feed, and this is not healthy food for cattle. Making biodiesel and using waste vegetable oil as a motor fuel is a much better use.

If I had my way, it would be illegal to make cattle feed out of waste vegetable oil from restaurants.

Don't charge road tax for cars that run on Waste Vegetable Oil for 10 years to get more of these conversions on the road.

Make it illegal to create local laws that declare that vegetable oil is a hazardous material, and get these laws off the books of cities in California that have these law. Most of these laws are initiated by Rendering Companies who don't want competition.

Give a state tax break to people who convert their cars to become Electric Vehicles.

Subsidize the cost of the batteries that go into electric vehicle conversions. This is the biggest cost, and subsidizing this would

get a lot more on the road.

Get biobutanol into gas stations in California. This is an alcohol, similar to ethanol, except that it has 4 main hydro carbon molecules instead of two. biobutanol runs in gasoline vehicles without modification. It is much cleaner than gasoline for pollution, and it is safer than gasoline. It can be made out of anything that ethanol can be made from. Also biobutanol does absorb water like ethanol does so it can use the existing infrastructure that is used for gasoline. Ethanol can't but must be trucked to gas stations.

Sincerely,

Rudy Stefenel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 19:17:35

No Duplicates.

**Comment 508 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Karen

Last Name: Linarez

Email Address: kjlinarez@yahoo.com

Affiliation:

Subject: Global warming

Comment:

The current administration, headed by a smart and dedicated Governor, has already shown real leadership on the issue of global warming. We need indirect source rules and a renewable energy portfolio standards. Please do your part in finishing what the Govenor started.

Calif. will once again lead through innovation and change.

thank you  
KJ Linarez

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 19:25:27

No Duplicates.

## **Comment 509 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Rudy  
Last Name: Stefenel  
Email Address: rudystefenel@yahoo.com  
Affiliation: Democrat

Subject: Support Green Vehicles

Comment:

Correction:

It is important to support and encourage people are leading the effort so switch to alternate fuel vehicles and green vehicles.

Here are suggestions:

Give a vehicle tax break to everyone who has a vehicle that gets more than 40 MPG. I suggest giving them \$150 dollar off their vehicle registration fee each year too.

Subsidize biodiesel. There are producers but the expenses of producing biodiesel is a problem. We need encourage more producers.

Also, give tax breaks to people who are creating biodiesel at home. One way is charge no sales tax on equipment for making biodiesel, both commercially and at home.

Don't charge road tax for biodiesel for 10 years to get more vehicles using this stuff.

Support waste vegetable oil diesel automobile conversions. These vehicles are much cleaner than gas and diesel vehicles, and comparable to biodiesel vehicles in the pollutants produced.

Also, most rendering companies sell the waste vegetable oil to companies that use it to make cattle feed, and this is not healthy food for cattle. Making biodiesel and using waste vegetable oil as a motor fuel is a much better use.

If I had my way, it would be illegal to make cattle feed out of waste vegetable oil from restaurants.

Don't charge road tax for cars that run on Waste Vegetable Oil for 10 years to get more of these conversions on the road.

Make it illegal to create local laws that declare that vegetable oil is a hazardous material, and get these laws off the books of cities in California that have these law. Most of these laws are initiated by Rendering Companies who don't want competition.

Give a state tax break to people who convert their cars to become Electric Vehicles.

Subsidize the cost of the batteries that go into electric vehicle conversions. This is the biggest cost, and subsidizing this would get a lot more on the road.

Get biobutanol into gas stations in California. This is an alcohol, similar to ethanol, except that it has 4 main hydro carbon molecules instead of two. biobutanol runs in gasoline vehicles without modification. It is much cleaner than gasoline for pollution, and it is safer than gasoline. It can be made out of anything that ethanol can be made from. Also biobutanol does NOT absorb water like ethanol does so it can use the existing infrastructure that is used for gasoline. Ethanol can't but must be trucked to gas stations.

Sincerely,

Rudy Stefenel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 19:31:41

No Duplicates.

**Comment 510 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: WalterMark  
Last Name: Poehner  
Email Address: markpoehner@hotmail.com  
Affiliation:

Subject: California Air Quality Standards  
Comment:

As a Californian I've been proud of the leadership that we take in the nation and the hemisphere in cleaning up the air. Although our standards have been under attack by industries whose leaders have irresponsible attitudes toward the Earth and our children, California has been steadfast.

Now I would like to see us raise the standards even higher. We are outdated, with regulations unsuitable for today's awareness of global warming.

Please raise the standards to lower levels of pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 19:55:09

No Duplicates.

**Comment 511 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: ARTHUR  
Last Name: AYALA  
Email Address: ARTHURA2@JUNO.COM  
Affiliation: citizen

Subject: pollution standards  
Comment:

cut the states global warming pollution, please

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 20:00:18

No Duplicates.

**Comment 512 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Myrna

Last Name: Brown

Email Address: myrnanddan@charter.net

Affiliation:

Subject: Global Warming

Comment:

We have at least two vital problems at this moment, Global warming and the economy. We stalled on correcting the economic problem until it was too late. Are we going to stall on global warming, too? We can still correct the economy, but we will never be able to correct global warming unless we act upon it post haste and even then it is questionable. But, we should at least give it a try. PLEASE HELP IN THIS MOST VITAL EFFORT!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 20:12:53

No Duplicates.

## **Comment 513 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Colin  
Last Name: Gallagher  
Email Address: colingallagher@sbcglobal.net  
Affiliation:

Subject: State should implement 50% RPS by 2020  
Comment:

From: Colin G. Gallagher, RPCV  
Candidate, Executive Master of Public Administration (June  
2009)  
Golden Gate University ~ Monterey Bay

We need a new Renewable Portfolio Standard (RPS) to increase clean energy in our state.

While I support CARB's preliminary recommendation that the state adopt a 33% RPS by 2020, I feel that an RPS of 50% by 2020 is more reasonable, and such an RPS should be adopted immediately.

Waiting longer increases the impacts from the use of fossil fuels. Waiting longer will discourage innovators, and innovative companies, who would like to do this sooner rather than later and who are looking for confident and bold regulatory signals that will 'green-light' their potential expansions into the field of green and clean energy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 20:38:42

No Duplicates.

**Comment 514 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Janet

Last Name: Jamerson

Email Address: jamerson\_37@msn.com

Affiliation:

Subject: Less overpopulation for stopping global warming

Comment:

SECURE OUR BORDERS. SINCE RONALD REAGAN LET THOSE ILLEGALS  
COMING HERE AND OVERPOPULATE TEN FOLD IN JUST 10-15 YEARS, CAUSING  
GLOBAL WARMING BESIDES TAKING OUR JOBS AND HOMES CAUSING THE  
FINANCIAL DISASTER WE ARE IN. WE NEED TO SECURE OUR BORDERS AND  
DEPORT ILLEGALS. IM NEED TO DO THERE JOB AND ARREST EMPLOYERS  
INCLUDING CORPORATIONS FOR HIRING THEM FINING THEM \$10,000 ALSO.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 21:01:16

No Duplicates.

**Comment 515 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: NANCIE

Last Name: SAILOR

Email Address: nsailor@ft.newyorklife.com

Affiliation:

Subject: cal. global warning

Comment:

WE HAVE TO GET ON TOP OF THIS PROBLEM IN CA. WITH GLOBAL WARNING  
FOR ALL SPECIES IN CA. AND ALL OVER THE WORLD LIKE NOW!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 21:11:44

No Duplicates.

**Comment 516 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mary

Last Name: Markus

Email Address: mmmarkus@earthlink.net

Affiliation:

Subject: Keep the ARB focused on global warming

Comment:

We need to evaluate the results of the measures like buying carbon offsets. Are they really working, or it it just another scam?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 21:35:19

No Duplicates.

**Comment 517 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Tom  
Last Name: Bornheimer  
Email Address: tpb4@ix.netcom.com  
Affiliation:

Subject: Make California The Leader in Fighting Global Warming  
Comment:

California must lead the fight against global warming, especially since we are responsible for creating much of the pollutants that continue to raise global temperatures. California has the technology and the people to be the leader in this very important and critical world wide issue. I commute on an electric bus and electric train. I drive less than 7,000 miles a year in a hybrid car. I buy organic local foods at my local Whole Foods and I lead a Green Team at my work place.

We can make a difference if we each try and think about others on the planet beyond ourselves. We are reaching critical mass on making a difference in combating global warming. Make California the leader.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 21:38:13

No Duplicates.

**Comment 518 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: don

Last Name: madden

Email Address: peacedog2@sbcglobal.net

Affiliation:

Subject: strong global warming action desired

Comment:

Please go for some very strong global warming action. kWe need it.  
Thanks, donM

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 21:50:23

No Duplicates.

**Comment 519 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Anthony

Last Name: Jones

Email Address: tony22j@aol.com

Affiliation: Anything to save the Planet !

Subject: Save the Planet

Comment:

AM UP TO THE NECK ABOUT PETROLIUM AND IT'S CONSECUENCE, WE NEED TO  
FIND AN ALTERNATIVE, SOME RENEWABLE ENERGY AS SOON AS RIGHT NOW  
THANK YOU TONY J.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 21:55:06

No Duplicates.

**Comment 520 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jana

Last Name: Menard

Email Address: janamenard@yahoo.com

Affiliation:

Subject: CARB Draft-please keep regs strong!

Comment:

As a Californian, one of the things I love is the natural beauty of our state. We need to protect it and our children from pollution.

Please put forth the strictest limits on emissions, and push forward a strong renewable energy plan. With all the sun and wind we have here, we could be an example for other states if we implement effective solar and wind energy programs. Let's lead the way!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 22:50:39

No Duplicates.

**Comment 521 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gary  
Last Name: Watkins  
Email Address: wasterix@aol.com  
Affiliation:

Subject: Air Quality Regulation  
Comment:

The Bush Administration has us mired in very bad energy policy. California has so often been the leader in social and cultural change. We can and should do it again by leading the country in a change of basic energy policy.

Thank you for all of your hard work on air quality in California.

Sincerely, Gary L. Watkins

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 23:04:29

No Duplicates.

**Comment 522 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Brett

Last Name: Roberts

Email Address: brett\_t\_roberts@yahoo.com

Affiliation:

Subject: Why Petroleum???

Comment:

With our current technology to harness multiple different clean energy sources quite cheaply and efficiently, what in the world would keep us from doing so???. Our state, our economy, and our planet deserve it!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 23:23:29

No Duplicates.

**Comment 523 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Antony  
Last Name: Mazzotta  
Email Address: amazzot@yahoo.com  
Affiliation:

Subject: keep the ZEV program strong  
Comment:

Let's show the world the way it should be done!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 23:37:14

No Duplicates.

**Comment 524 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mali

Last Name: Henigman

Email Address: malih2000@yahoo.com

Affiliation:

Subject: clean energy

Comment:

We need sensible laws to clean up the pollution we have and to find alternative energy. A no-brainer. Yet there is talk of "clean" coal. Huh? Ever hear of the canary in the mine shaft? Well, we're it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 23:37:42

No Duplicates.

**Comment 525 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Camille  
Last Name: Pierce  
Email Address: marklael@aol.com  
Affiliation: retired

Subject: Global Warming  
Comment:

Global Warming is one of the most powerful and temperature related issue in today's society. It can affect millions of people when it's least expected. I was born in the midwest some years ago. In my teens, I learned that I had a seizure disorder. Thus, I had to adjust my medical disability to one that could be useable to a wide range of people with health issues. Today, I spend most of my time indoors. And I believe we all should listen to what is needed and necessary to remain healthy. Listen to your body and try to see what can help people avoid heat, yet enjoy the outdoors.

May peace of mind be with us always,  
Camille Pierce  
California USA  
marklael@aol.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 01:35:10

No Duplicates.

**Comment 526 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: David

Last Name: Brunk

Email Address: dblovesla@sbcglobal.net

Affiliation:

Subject: Global warminming Mitigation

Comment:

Save California's agriculture from climate change that will  
destroy the viability of the Golden State.

It is no longer just the health of the population at stake, it  
is the lives of the children of the future. our children!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 04:59:36

No Duplicates.

**Comment 527 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: jonathan

Last Name: guerra

Email Address: katseye6922@yahoo.com

Affiliation:

Subject: help our children

Comment:

please help us leave a better legacy than the one left to us

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 05:50:32

No Duplicates.

**Comment 528 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: sheila

Last Name: carrillo

Email Address: [escuelita@baymoon.com](mailto:escuelita@baymoon.com)

Affiliation:

Subject: solar incentives

Comment:

California should lead the nation in a plan to effectively curb global warming. Attractive financial incentives for homes and businesses to convert to solar electricity and hot water as well as incentives for purchasing electric or hybrid cars would give Californians a huge impetus to make the costly changes.

Thanks.

Sheila Carrillo

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 07:11:55

No Duplicates.

**Comment 529 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: phil

Last Name: winkels

Email Address: nocaliman1@aol.com

Affiliation:

Subject: protect the air quality

Comment:

please help to protect the air quality for our kids...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 07:16:14

No Duplicates.

## **Comment 530 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Deborah  
Last Name: Pendrey  
Email Address: deborah.rssc@sbcglobal.net  
Affiliation:

Subject: AB 32  
Comment:

We need a well-designed cap-and-trade program. CARB should include as many sources as possible in a cap-and-trade system. I support CARB's preliminary thinking that 80% of California's global warming pollution would be under a cap-and-trade system by 2020. Cap-and-trade puts an absolute limit on pollution from some of California's largest sources and guarantees the environmental results we need.

We need an "Indirect Source Rule" (ISR) to control emissions from development projects. CARB should require California's local air districts to develop ISRs to control emissions from new developments.

We need a new Renewable Portfolio Standard (RPS) to increase clean energy in our state. I support CARB's preliminary recommendation that the state immediately adopt a 33% RPS by 2020.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 07:32:03

No Duplicates.

**Comment 531 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Roy

Last Name: Vanderleelie

Email Address: lonewolf@telis.org

Affiliation:

Subject: scoping plan

Comment:

We must take the lead in cleaning our air, make our waters safer  
and tackle the global warming danger.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 07:36:48

No Duplicates.

**Comment 532 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: jerry

Last Name: wayne

Email Address: jmw54@hotmail.com

Affiliation:

Subject: Global Warming

Comment:

Stop Global Warming by looking at alternatives. And if you really want to stop it just tell all auto makers that in 5 years no cars will be sold in California unless they have zero emissions. I believe that we have the brain power and expertise to do this 20 years ago. Just no one was brave enough to tell them to "s" or get off the pot, so to speak.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 07:41:04

No Duplicates.

**Comment 533 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Mark  
Last Name: Szymczak  
Email Address: markzimzak@yahoo.com  
Affiliation:

Subject: AB32 and AB974  
Comment:

Ms Nichols...

I support CARB's preliminary recommendation that the state immediately adopt a 33% RPS by 2020.

I also think CARB should include as many sources as possible in a cap-and-trade system.

I think AB974 should have gone further to increase revenue sources to combat port pollution. What if (?) instead of \$30/container, AB974 mandated \$300 or \$1000 per container? Consumers across America (not just us California taxpayers) should pay for the controls needed to mitigate air pollution coming from container ships, trucking, trains, and port service equipment. Right now, it's many of us Californians breathing in foul air as a result of America's incessant need to consume. CARB has the capacity to do more about this!

Thank you.

Mark Szymczak  
Pleasanton Resident & breather of the Ports dirty Air

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 07:46:14

No Duplicates.

**Comment 534 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: adene

Last Name: katzenmeyer

Email Address: adene@aceweb.com

Affiliation:

Subject: air cOntrol

Comment:

Please help keep our air quality pure and safe. Do not turn your  
backs on your citizens. We have a docomoracy in America so do  
what the people want.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 08:09:41

No Duplicates.

**Comment 535 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sylvia

Last Name: Jones

Email Address: syljones@earthlink.net

Affiliation:

Subject: air qualilty

Comment:

If we didn't waste a lot of time and money bailing out the auto industry, we'd have everything we need to get out from under this fog and smog AND get the economy going with green jobs and green development.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 08:20:30

No Duplicates.

**Comment 536 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Deborah

Last Name: Chertow

Email Address: romaround2@aol.com

Affiliation:

Subject: Global warming in California and elsewhere...our World...

Comment:

We have to take action against Global Warming here in California and the rest of the world as well. It is at a crisis point.. Time to take action and start helping to prevent any more deterioration of our planet, in California, and the world.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 08:38:48

No Duplicates.

**Comment 537 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gail  
Last Name: Imler  
Email Address: gailimlmarin@hotmail.com  
Affiliation:

Subject: Global Warming  
Comment:

PLEASE LET CALIFORNIA CONTINUE TO BE A LEADER IN THE FIGHT AGAINST  
GLOBAL WARMING!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:00:59

No Duplicates.

**Comment 538 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Dan  
Last Name: Backstrom  
Email Address: dbackstr@rbuhsd.k12.ca.us  
Affiliation:

Subject: A. B. 32 scoping plan  
Comment:

To Whom It May Concern

Our great state has always been a leader in inovation for the country. We have shown what is possible so that others will see how it can work for them. Please continue to support this great tradition.

Respectfully  
Dan Backstrom

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:01:05

No Duplicates.

**Comment 539 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Peter  
Last Name: Hines  
Email Address: jpeterhines@hotmail.com  
Affiliation:

Subject: Global Warming  
Comment:

Please take extremely strong measures to immediately reduce global warming pollution in CA.

As part of your plan, I urge you to re-instate the CA Zero Emissions Mandate, which would require that a growing percentage of automobiles sold in CA each year would produce Zero Emissions.

This is a critical issue for all of us, and CA has an opportunity to continue taking a strong leadership position on this vital issue. Our quality of life and our ability to sustain ourselves is at stake.

Sincerely,

Peter Hines  
Santa Rosa, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:01:32

No Duplicates.

**Comment 540 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Matt

Last Name: Woolery

Email Address: mattwoolery@hotmail.com

Affiliation:

Subject: Smart California

Comment:

We are smarter than this, aren't we? Of course we are. That we don't have the technology is not the problem, is it?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:13:59

No Duplicates.

**Comment 541 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Margaret Christine  
Last Name: Robinett, DC, MSTCM,  
Email Address: chrisdc@flash.net  
Affiliation:

Subject: AB 32 Scoping Plan  
Comment:

Please vote yes on this bill to reduce greenhouse gases, improve our air and invest in the future of alternative energy sources to sustain us longterm.

In doing so, California will lead the way for the rest of the nation in the advancement of green technology, creation of green-collar jobs and alternative energy infrastructure.

It's the biggest win-win for Californians and the planet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:20:32

No Duplicates.

**Comment 542 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: kathy

Last Name: mesch

Email Address: k.mesch@cox.net

Affiliation:

Subject: california air

Comment:

Please help.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:29:16

No Duplicates.

**Comment 543 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michelle  
Last Name: Palladine  
Email Address: mpalladine@earthlink.net  
Affiliation:

Subject: Clean Air in California  
Comment:

Please stop allowing people to use windmills as a tax write off without making them actually run their windmill(s) for a required number of weeks throughout the year. We have enough windmills in the Coachella Valley to power the entire valley year round. Why aren't we doing that??

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:34:19

No Duplicates.

**Comment 544 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lynda  
Last Name: Winslow  
Email Address: lyndaw@mediaweavers.com  
Affiliation:

Subject: Global Warming and CO(2) emission cleanup  
Comment:

California needs to lead in cutting emissions which contribute to  
Global Warming.

We need to lead with legislation, with technology, with our  
hearts, with our daily efforts.

Anything else we might do is icing. Please make every effort you  
can to promote leadership in California so that we can solve this  
crucial problem.

Sincerely,

Lynda Winslow  
Berkeley, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:41:08

No Duplicates.

**Comment 545 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Andrew  
Last Name: Bezella  
Email Address: dovienya@yahoo.com  
Affiliation:

Subject: A.B. 32 Scoping Plan  
Comment:

CARB should include as many sources as possible in a cap-and-trade system. I support CARB's preliminary thinking that 80% of California's global warming pollution would be under a cap-and-trade system by 2020.

CARB should require California's local air districts to develop ISRs to control emissions from new developments.

I support CARB's preliminary recommendation that the state immediately adopt a 33% RPS by 2020.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:46:37

No Duplicates.

**Comment 546 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: suzanne  
Last Name: livingston  
Email Address: casamode@hotmail.com  
Affiliation:

Subject: California air Resources  
Comment:

Let's go GREEN!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 09:47:54

No Duplicates.

**Comment 547 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Tammy  
Last Name: Winkler  
Email Address: winkforhomes@cox.net  
Affiliation:

Subject: Please help planet.  
Comment:

Please do everything you can to help mitigate global warming.  
Thank you. :)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 10:27:14

No Duplicates.

**Comment 548 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Matthew  
Last Name: Warshauer  
Email Address: mattwarsh@yahoo.com  
Affiliation:

Subject: Please make Global Warming a top priority.  
Comment:

Please make the environment and global warming a top priority. As California, we can lead the way for other states, and the US as a whole, to take action.

Thanks,

Matt

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 11:17:28

No Duplicates.

**Comment 549 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jon  
Last Name: Anderholm  
Email Address: xunbio@hotmail.com  
Affiliation:

Subject: climate change...  
Comment:

Yes ... we need to invest heavily to protect our climate... our  
future  
do your part,  
sincerely, Jon Anderholm Cazadero, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 11:19:22

No Duplicates.

**Comment 550 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Randall

Last Name: Hartman

Email Address: erthguy2@earthlink.net

Affiliation:

Subject: global warming

Comment:

Please enact strong greenhouse gas protections. This is the single most important issue of our times, and perhaps in all the history of mankind.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 12:21:18

No Duplicates.

**Comment 551 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: sidney

Last Name: ramsden scott

Email Address: sidscott2000@hotmail.com

Affiliation:

Subject: clean energy

Comment:

let's invest in ONLY clean renewable energy sources!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 12:35:30

No Duplicates.

**Comment 552 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Patricia

Last Name: Alejandro

Email Address: patty.alejandro@yahoo.com

Affiliation:

Subject: Global Warming

Comment:

It seems that the serious current issue of global warming has been eclipsed by the current economic crisis that we're undergoing right now. I don't think we should forget about our world. Remember that if our environment goes down we all go down.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 12:37:18

No Duplicates.

**Comment 553 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: john  
Last Name: felstiner  
Email Address: felstiner@stanford.edu  
Affiliation:

Subject: A.B. 32 Scoping Plan  
Comment:

Please support the A.B. 32 Scoping Plan! EDF is a strong guide  
here.

Thanks!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 12:43:15

No Duplicates.

## **Comment 554 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Margie  
Last Name: Tannler  
Email Address: marjhe@aol.com  
Affiliation:

Subject: RE: Draft A.B. 32 Scoping Plan  
Comment:

Dear Mary Nichols, Board Chairman, CARB,

According to the Environmental Defense Fund, of which I am a part, the following three issues are important to California's future and to the groundbreaking efforts to fight global warming:

1) A well-designed cap-and-trade program is needed. Cap-and-trade puts an absolute limit on pollution from some of California's largest sources and guarantees the environmental results needed. CARB needs to include as many sources as possible in a cap-and-trade system. I support CARB's preliminary thinking that 80% of California's global warming pollution would be under a cap-and-trade system by 2020.

2) An "Indirect Source Rule" (ISR) to control emissions from development projects is needed. What is an ISR? Developers measure indirect (mostly vehicle and energy use) pollution from construction and operation of projects and ensure that equivalent reductions occur so the project's impacts are limited. CARB needs to require California's local air districts to develop ISRs to control emissions from new developments.

3) We need a new Renewable Portfolio Standard (RPS) to increase clean energy in our state. An RPS is a requirement that a percentage of all energy sold in California be generated from renewable sources (solar, wind, biomass, etc). California's current RPS target is 10% by 2010. I support CARB's preliminary recommendation that the state immediately adopt a 33% RPS by 2020.

Please include these ideas in the Draft A.B.32 Scoping Plan.

Sincerely yours,

Margie Tannler  
Oceanside, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 12:44:19

No Duplicates.

**Comment 555 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Susan  
Last Name: Christopher  
Email Address: writerlady@cox.net  
Affiliation: Democratic

Subject: global warming  
Comment:

It's time we realized that we must do something about sustaining what sustains us--our planet! It should be our first thought and action. When our planet and all it's resources are finally wiped out what will we do? We've got to think of the long-term and stop getting snagged on short-term hysterics.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 13:20:23

No Duplicates.

**Comment 556 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Frank

Last Name: Murray III

Email Address: drfm3@cox.net

Affiliation:

Subject: AB 32 Scope Plan

Comment:

I am in support of ensuring that cap and trade and renewable (RPS) sources are the focus of CARB. Per EDF's strong push and advocacy on these issues, please note my support for such as a citizen of Southern California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 13:25:13

No Duplicates.

**Comment 557 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Louise

Last Name: Fleming

Email Address: louise.fleming@att.net

Affiliation:

Subject: Renewable Energy Policy in CA

Comment:

There is NO EXCUSE for a sun-drenched state like CA to not have all new home/building construction with SOLAR PANELS installed, and older buildings should receive a tax-credit or subsidy for solar panels on their roofs.

There is NO EXCUSE for for not having an efficient, reliable PUBLIC TRANSPORTTION system to serve all Californians, including those in outlying areas of LA/Orange counties. This should include increased express bus & local bus services, using natural gas or electricity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 13:27:51

No Duplicates.

**Comment 558 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Jan  
Last Name: Mcfarland  
Email Address: [jmcfarland@treasurer.ca.gov](mailto:jmcfarland@treasurer.ca.gov)  
Affiliation: CAEATFA

Subject: Possible Inclusion of Broader Incentives for Zero-Emission Heating and Cooling  
Systems  
Comment:

Hello,

I have attached information pertaining to the immense GHG  
reduction potential using Zero-Emission Heating and Cooling  
Systems.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1186-arb\\_final\\_filed\\_9\\_30.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1186-arb_final_filed_9_30.pdf)

Original File Name: ARB Final Filed 9 30.pdf

Date and Time Comment Was Submitted: 2008-09-30 13:59:49

No Duplicates.

**Comment 559 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Dale

Last Name: Anania

Email Address: daanania@yahoo.com

Affiliation:

Subject: Stop Global Warming

Comment:

You can do it!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 14:34:54

No Duplicates.

**Comment 560 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Michael  
Last Name: McGraw  
Email Address: Mike\_McGraw@oxy.com  
Affiliation:

Subject: Comments of Occidental Petroleum on the ARB Draft Scoping Plan and Appendices  
Comment:

Please accept Oxy's comments.

Thank you, Mike McGraw

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1194-oxy\\_comments\\_9-30-08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1194-oxy_comments_9-30-08.pdf)

Original File Name: Oxy Comments 9-30-08.pdf

Date and Time Comment Was Submitted: 2008-09-30 15:32:07

No Duplicates.

**Comment 561 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Dean

Last Name: Johnson

Email Address: deanwj@yahoo.com

Affiliation:

Subject: Your future actions on electric cars

Comment:

You past actions against this technology was noted, and you will be held accountable for any actions, as you acted before, that slows down the adoption of these technologies supporting electric transportation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 15:42:41

No Duplicates.

**Comment 562 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Martha

Last Name: Ozonoff

Email Address: mozonoff@californiareleaf.org

Affiliation: California ReLeaf

Subject: including urban forestry in scoping plan

Comment:

I respectfully submit the following comments related to the Air  
Resources Board's draft Scoping Plan

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1196-  
ca\\_releaf\\_letter\\_local\\_government\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1196-ca_releaf_letter_local_government_scoping_plan.pdf)

Original File Name: Ca Releaf letter Local Government Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-09-30 16:03:00

No Duplicates.

**Comment 563 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: John  
Last Name: Busterud  
Email Address: cseghers@arb.ca.gov  
Affiliation: Joint IOU's

Subject: Draft Scoping Plan  
Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1198-9\\_30\\_08\\_jointious.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1198-9_30_08_jointious.pdf)

Original File Name: 9\_30\_08\_JointIOUs.pdf

Date and Time Comment Was Submitted: 2008-09-30 16:20:11

No Duplicates.

**Comment 564 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: leroy

Last Name: Ryan

Email Address: leroypryan@aol.com

Affiliation:

Subject: Global warming/cap and trade

Comment:

Please leave no leaf unturned when implementing the California law concerning global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 16:20:38

No Duplicates.

**Comment 565 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Kathryn

Last Name: Phillips

Email Address: cseghers@arb.ca.gov

Affiliation: Environmental Defense Fund

Subject: AB 32

Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1202-9\\_30\\_08\\_edf.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1202-9_30_08_edf.pdf)

Original File Name: 9\_30\_08\_EDF.pdf

Date and Time Comment Was Submitted: 2008-09-30 16:27:01

No Duplicates.

**Comment 566 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Lisa

Last Name: Rivas

Email Address: cseghers@arb.ca.gov

Affiliation: Regional Legislative Alliance

Subject: AB 32 Scoping Plan

Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1203-9\\_24\\_2008\\_regionallegislativealliance.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1203-9_24_2008_regionallegislativealliance.pdf)

Original File Name: 9\_24\_2008\_regionallegislativealliance.pdf

Date and Time Comment Was Submitted: 2008-09-30 16:30:44

No Duplicates.

**Comment 567 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Clayton

Last Name: Snyder

Email Address: ctsnyder08@yahoo.com

Affiliation:

Subject: AB 32

Comment:

This measure must be passed. Cap and trade, indirect source provisions must be a part of it, and improved public transit state-wide should go a long way toward achieving the stated targets. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 16:40:51

No Duplicates.

**Comment 568 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Marijo  
Last Name: Van Dyke  
Email Address: mjvan@cox.net  
Affiliation:

Subject: Global Warming  
Comment:

California will have to show its leadership. The Federal Government is not even thinking about the widespread damage that global warming will cause. We have to take action beyond that which we already have at our state level. Thank you for your leadership on this issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 17:49:18

No Duplicates.

**Comment 569 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Barbara

Last Name: Attell

Email Address: battell@sbcglobal.net

Affiliation:

Subject: Global Warming

Comment:

Please make our environment a priority and help to find solutions  
to global warming.

Thank you,

Barbara Attell

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 18:58:27

No Duplicates.

**Comment 570 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: j  
Last Name: mcintyre  
Email Address: ishi717@cox.net  
Affiliation:

Subject: Clean Air  
Comment:

Clean Air

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1217-ea](http://www.arb.ca.gov/lists/sp-general-ws/1217-ea)

Original File Name: ea

Date and Time Comment Was Submitted: 2008-09-30 21:33:10

No Duplicates.

**Comment 571 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: John  
Last Name: Brockman  
Email Address: jbrockman@evalulogix.com  
Affiliation:

Subject: Urgent need.  
Comment:

Renewable energy ASAP.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 23:31:00

No Duplicates.

**Comment 572 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rachel  
Last Name: Morris  
Email Address: rachel@vccool.org  
Affiliation: VCCOOL

Subject: AB32 Scoping Plan - An Environmental Organization Perspective  
Comment:

Please accept our comments on the AB32 Scoping Plan.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1222-vccool\\_ab\\_32\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1222-vccool_ab_32_plan_comments.pdf)

Original File Name: VCCOOL AB 32 Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-09-30 23:35:57

No Duplicates.

**Comment 573 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Julianne  
Last Name: Erickson  
Email Address: krazyleggz32@yahoo.com  
Affiliation:

Subject: Global Warming  
Comment:

Please take strong action against global warming in California. It is a top priority among a lot of the citizens of California and the world. Action needs to be taken today for a better tomorrow.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 05:24:21

No Duplicates.

**Comment 574 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Kaplan  
Email Address: sarah\_ball@hotmail.com  
Affiliation:

Subject: A.B. 32 Scoping Plane  
Comment:

Please make the increased use of renewable energy a priority.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 07:15:23

No Duplicates.

**Comment 575 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Bret  
Last Name: Smith  
Email Address: viajeroperdido@hotmail.com  
Affiliation:

Subject: renewable energy  
Comment:

Californian has the ability to lead the nation in renewable energy development, research, manufacturing, installation and more. We can create thousands of jobs and break our dependence on foreign oil. It's really a no brainer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 07:27:22

No Duplicates.

**Comment 576 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: LLOYD

Last Name: PECKNER

Email Address: LPECKNER@HOTMAIL.COM

Affiliation:

Subject: GLOBAL WARMING

Comment:

I am writing you to urge that you support either a carbon tax or a strong "cap and trade" system to help reduce our carbon emissions.

I would also urge that you steadily and progressively increase the renewable energy mandate so that investors (and companies) have a real incentive to look into "clean energy"

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 09:13:02

No Duplicates.

**Comment 577 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: pablo  
Last Name: bryant  
Email Address: pvb1000@yahoo.com  
Affiliation:

Subject: plan of attack for global warming  
Comment:

To whom it may concern

I understand that you are working on measures to minimize greenhouse gases and I wanted to encourage you as a well read citizen on this matter to use a few methods that would help to ensure your success. First, a cap and trade program will do most of the work for you, as it will make the needed changes financially attractive to the corporations who have up to now resisted implementing technologies that would be more efficient and green.

Also we need a renewable portfolio standard (RPS) and you of course know what this is. I believe that we should aim for 35% to 45% of our energy to come from green sources (Solar wind geothermal).

As a society we are moving in this direction, and it is of course not only time to change, but we now have the technology to change and if we don't there are dire consequences.

Thanks you  
Pablo Bryant

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 09:23:51

No Duplicates.

## **Comment 578 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Valerie  
Last Name: Zachary  
Email Address: cd33333@aol.com  
Affiliation:

Subject: AB 32

Comment:

We've got to stop using resources at an insane rate. More oil will just feed our addiction. NOW is the time for a real change--to shift our focus to conservation, different transportation, and non-polluting, sustainable, renewable resources.

Our domestic need for oil will always be out of balance with the tiny supply we could produce. This would be true if we drilled every square inch of every acre of sensitive or protected public lands. It is not worth the cost! Please do whatever you can to protect nature from oil and gas development.

Our last great places are going away acre by acre. There is no replacing them. When the oil is gone, when the gas is gone, when we've disturbed ecosystems with our vehicles, what's left? These places are never put back the way they were, no matter what corporations say or how much they are fined.

Once it's gone, it's gone. We humans are only as healthy as we keep our planet. Let's stop the rape.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 11:23:22

No Duplicates.

## **Comment 579 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Barbara

Last Name: Rivenes

Email Address: brivenes@sbcglobal.net

Affiliation: Sierra Nevada Group/Sierra Club

Subject: AB 32 Draft Scoping Plan comments

Comment:

Thank you for the opportunity to submit comments on the future goals and implementation of AB 32 - one of the most important legislative opportunities to address climate change and greenhouse gas emissions in our state. The goals and implementation measures must be stringent and yet attainable. I am submitting these comments on behalf of the Sierra Nevada Group of the Sierra Club. Members of our Group reside in Nevada County and parts of Yuba and Sierra counties. And I am submitting these remarks in the General Comment category as they overlap and do not easily fit into the more specific sections. Further I would like to acknowledge the Sierra Nevada Alliance for their help in developing comments for those of us living in the Sierra.

Below are my comments.

October 1, 2008

California Air Resources Board

Re: AB 32 Draft Scoping Plan comments

I am commenting on behalf of the Sierra Nevada Group of the Sierra Club. We represent Sierra Club members living in the foothills of the Sierra Nevada encompassing Nevada county and parts of Yuba and Sierra counties. AB 32 provides the opportunity to be proactive about climate change and the role of greenhouse gas emissions in the environment. The goals and implementation must be stringent and yet attainable. The following are some points

1)Our priority recommendation is that the Sierra Nevada region be included in the Plan and in any Regional Planning Framework. Any vehicles for developing regional targets for reducing GHG emissions should include the Sierra Nevada region. The Sierra Nevada is the third fastest growing region of the state of California. We supply over 65% of the state's developed water. Our region houses half the animal and plant life of the state. Millions of people visit the Sierra Nevada every year. The use of Metropolitan Planning Organizations would virtually exclude 20 of the 22 counties within the Sierra Nevada region and not fully address the land-use related greenhouse gas emissions to which they both contribute to and are affected by. Though we do support regional planning, but feel strongly that a regional approach beyond the MPO's needs to be recognized. We recommend that CARB create a mechanism for geographic implementation of AB 32 in the Sierra Nevada.

2)We further recommend strong and enforceable mechanisms for

reducing greenhouse gas emissions through improved land use and transportation policies and including a larger target. Improving land use planning is important for the Sierra Nevada. The population of some counties in the Central Sierra is expected to increase by 40 to 84% over 2000 levels by 2020. If current trends continue, much of this new population will be accommodated by low density residential development, a dominant development pattern throughout the region that consumes valuable habitat, working landscapes, watershed infrastructure, and increases per capita vehicle miles traveled. Land use and city and county general plan decisions should be elevated to a central focus of the Plan. We support efforts to make sure the Scoping Plan for AB 32 includes a better framework for land use and transportation, and believe that the 2 million metric target set for land use is far too low to effectively reduce carbon emissions associated with vehicle miles traveled. The "Climate Action Team Proposed Early Actions to Mitigate Climate Change in California, Draft for Public Review," allotted 18 MMT by 2020 to "regional transportation/smart growth land use measures." Surely the draft Scoping Plan can match this target. We would urge CARB to prioritize policies to fund public transportation, ensure creation of "walkable" communities, reduction of vehicle miles traveled even in our rural areas, support adoption of a statewide Indirect Source Rule for carbon emissions and assign value to natural landscapes that sequester carbon which would encourage planning entities to adopt land use plans that conserve such landscapes.

3) Also important to consider are the implications land use planning has for wildfire hazard. Evidence suggests that residential and commercial structures in the wildland urban interface exacerbate the likelihood of wildfire. In the Sierra 94% of all new projected development is expected to take place in areas of very high or extreme wildfire hazard. Wildfires can be a major source of carbon emissions and particulate matter during the summer months throughout the state. AB32 can provide a framework for rural counties to improve land use planning and not only further reduce carbon emissions, but also would serve as a valuable means for protecting working landscapes and local food sources, and preserving watershed infrastructure. Watershed protection will become an issue of greater importance as global warming begins to affect the snow storage capacity provided by the mountains of the High Sierra. AB32 is an opportunity to encourage better planning throughout the state, including, if implemented carefully, better planning for the watersheds of the Sierra Nevada that are essential to the health and security of our water supply.

4) It is important to dedicate water saved from water efficiency for drought and in-stream flows can help with climate adaptation strategies. The Scoping Plan should be applauded for promotion of water efficiency as a means to save energy. More detail on how water efficiency will be implemented is needed. We encourage CARB to note, however, that these water savings should not be used to support new growth and expanded development, but to support existing development and agriculture in times of drought and to be allocated back to the environment for in-stream flows. In the past, water savings have been used to support new growth and development, instead of being returned as in-stream flows for habitat needs or saved for existing development and agriculture to create a buffer in times of drought. However, if the saved water was allocated to existing communities for times of drought, and/or allocated for in stream flows to reduce the stress to aquatic habitat, then these water savings would lead to a reduction in greenhouse gases overall. All Sierra Nevada streams and rivers have been impacted over the past 150 years through a series of human development.

5)We commend CARB for acknowledging the need to maintain current carbon stocks in forests. We encourage you to develop a sophisticated approach to sustaining forests and conducting fuel load reduction to address catastrophic fire. This approach is more than locking up forests in their current condition (overstocked and lacking naturally-occurring fire regimes to maintain their health) - and more than taking out trees to reduce fuel load, irrespective of tree diameter and greater ecological functions. The Plan should recognize that fire is a natural and necessary part of California's environment and will be an important part of how our natural systems adapt to a changing climate. Suppressing all natural fire to achieve greenhouse gas emissions is not an effective tool for our future. Our forests need fire to be healthy. We encourage the state to focus fuels reduction efforts (and other proactive fire planning activities) on protecting communities from fire.

6)We also encourage CARB to address other carbon sinks beyond pine trees. This includes oak woodlands, grasslands, soil, wetlands and other vegetation. To focus simply on forests and not address carbon sequestration through these other habitats and vegetation misses an important part of the carbon cycle. The California Oak Foundation is a great resource on oak sequestration.

We recommend that CARB and the Department of Conservation create a statewide program to inventory and assess the carbon sequestration and storage of natural and working landscapes across the state, and develop protocols for measuring carbon sequestration and stocks.

Sincerely,  
Barbara Rivenes

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 14:36:06

No Duplicates.

**Comment 580 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: John

Last Name: Ross

Email Address: johnross14@hotmail.com

Affiliation: Democrat

Subject: Lets make sure California continues to lead the country by cutting our warming footprint

Comment:

Two years ago, Governor Schwarzenegger signed the boldest global warming law in U.S. history, A.B. 32. Since then, the California Air Resources Board (CARB) has been at work on a blueprint of policies and measures needed to cut global warming pollution by 30% by 2020, as required by the law.

This blueprint, called the "A.B. 32 Scoping Plan," will be released publicly in two weeks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 15:11:30

No Duplicates.

## **Comment 581 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Elaine  
Last Name: Genasci  
Email Address: egenasci@charter.net  
Affiliation:

Subject: Strong Global Warming Action  
Comment:

We need a well-designed cap-and-trade program.

Cap-and-trade puts an absolute limit on pollution from some of California's largest sources and guarantees the environmental results we need.

Our message: CARB should include as many sources as possible in a cap-and-trade system. We support CARB's preliminary thinking that 80% of California's global warming pollution would be under a cap-and-trade system by 2020.

We need an "Indirect Source Rule" (ISR) to control emissions from development projects.

What is an ISR? Developers measure indirect (mostly vehicle and energy use) pollution from construction and operation of projects and ensure that equivalent reductions occur so the project's impacts are limited.

Our message: CARB should require California's local air districts to develop ISRs to control emissions from new developments.

We need a new Renewable Portfolio Standard (RPS) to increase clean energy in our state.

An RPS is a requirement that a percentage of all energy sold in California be generated from renewable sources (solar, wind, biomass, etc). California's current RPS target is 10% by 2010.

Our message: We support CARB's preliminary recommendation that the state immediately adopt a 33% RPS by 2020.

Thank you,  
Elaine Genasci

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 17:52:15

653 Duplicates.



**Comment 582 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Greg

Last Name: Woodside

Email Address: gwoodside@ocwd.com

Affiliation:

Subject: comments from Orange County Water District

Comment:

see attached file.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1254-wet\\_cat\\_comments\\_october\\_2008.doc](http://www.arb.ca.gov/lists/sp-general-ws/1254-wet_cat_comments_october_2008.doc)

Original File Name: WET CAT comments October 2008.doc

Date and Time Comment Was Submitted: 2008-10-01 18:25:33

No Duplicates.

## **Comment 583 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Brenden

Last Name: McEneaney

Email Address: [bmceneaney@usgbc-la.org](mailto:bmceneaney@usgbc-la.org)

Affiliation: USGBC - Los Angeles Chapter

Subject: Feedback on Draft Climate Change Scoping Plan

Comment:

1. The USGBC-NCC supports the ARB in the development of the AB 32 implementation scoping plan.
2. We support the Green Building Community as a major stakeholder in the continuing development of the scoping plan with ARB research sub-group
3. Each of the major industry sectors should quantify the portion of their GHG emissions which is indirectly attributable to existing buildings and new construction.
4. The ARB should work towards an eventual single building protocol for evaluating GHG. Comprehensive statewide report quantifying GHG. Build off the gains of the statewide Zero Net Energy (ZNE) residential and commercial new construction goals.
5. Consider the development of incentives for energy and other improvements to existing buildings. The state must incentivize Green Buildings using tax credits and other financing tools.
6. That while efficiencies and offsets are valuable tools towards reducing GHG emissions, conservation should be prioritized as the most cost effective and permanent reduction available.
7. The ultimate goal should look beyond 2020 towards a fundamentally stable climate.
8. Explicitly require ongoing measurement, verification and centralized reporting of energy GHG reductions by Green Buildings.
9. The GHG cap and trade market should ultimately include individual building owners as direct owners of their GHG credits
10. Training of workforce and all relevant market actors, i.e. Building Departments
11. Incentivize Smart Growth.
12. Focus on existing building infrastructure as well as new construction

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1268-arb\\_draft\\_scoping\\_plan\\_talking\\_points\\_090208.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1268-arb_draft_scoping_plan_talking_points_090208.pdf)

Original File Name: ARB Draft Scoping Plan talking points 090208.pdf

Date and Time Comment Was Submitted: 2008-10-02 12:16:57

No Duplicates.

**Comment 584 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Dianne

Last Name: Tanaka

Email Address: divadesigned@hotmail.com

Affiliation:

Subject: CA Air Resources

Comment:

Do we have the right as the most powerful (and destructive) species  
on the planet to contaminate the entire earth with our pollutants?  
Shouldn't we ensure clean air and water for all beings on the  
planet?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-02 13:06:50

No Duplicates.

**Comment 585 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: john  
Last Name: hollis  
Email Address: hollisent@netwood.net  
Affiliation:

Subject: higher RPS target needed  
Comment:

Aim higher.  
We are missing the mark.

Far better too much, than not enough action on this one by far.  
shoot for 50% by 2010 at the very least!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-02 13:50:09

No Duplicates.

## **Comment 586 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Meredith

Last Name: Niles

Email Address: meredith@icta.org

Affiliation:

Subject: AB32 comments from the Center for Food Safety and the Cool Foods Campaign

Comment:

Please find attached comments from the Center for Food Safety and the Cool Foods Campaign.

CFS is a non-profit public interest and environmental advocacy membership organization established in 1997, working to protect human health and the environment from potentially harmful food production technologies and promoting sustainable alternatives. CFS combines multiple tools and strategies in pursuing its goals, including litigation and legal petitions for rulemaking, policy and research, as well as public education.

The Cool Foods Campaign of the Center for Food Safety is a public advocacy education campaign to inform the public about the impact of greenhouse gas (GHG) emissions from agriculture and the food system on global warming. The Campaign has conducted extensive scientific data analyses of greenhouse gas emissions from all aspects of the U.S. food system. The aim of the Campaign is to educate people about the impact of their food choices across the entire food system and create lifestyle and legislative changes to reduce global warming. Our campaign seeks solutions to the problem of global warming, and focuses on agricultural practices and food choices that can reduce and reverse this trend.

While the Center for Food Safety and the Cool Foods Campaign focus mainly on sustainable agriculture, we are submitting our comments under "general comments" because there are a number of areas included in the scoping plan that directly affect farming and agriculture in various sectors. While the draft scoping plan specifically details agriculture as a sector, our comments will focus more broadly on the entire food system of California, which is incorporated into various sectors including transportation, recycling and waste, water usage, industry and electricity. We will be focusing on the ways in which food and the food production and distribution system can limit its overall greenhouse gas emissions on a government, industry and household level.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1271-ab\\_32\\_draft\\_scoping\\_plan\\_comments.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1271-ab_32_draft_scoping_plan_comments.pdf)

Original File Name: AB 32 draft scoping plan comments.pdf

Date and Time Comment Was Submitted: 2008-10-02 14:05:58

No Duplicates.

**Comment 587 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Karen

Last Name: McDonough

Email Address: karen.mcdonough@sanjoseca.gov

Affiliation: City of San Jose

Subject: Comments from the City of San Jose

Comment:

See attached file

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1273-csj\\_ab32\\_10\\_2\\_08.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1273-csj_ab32_10_2_08.pdf)

Original File Name: CSJ AB32 10\_2\_08.pdf

Date and Time Comment Was Submitted: 2008-10-02 16:52:04

No Duplicates.

**Comment 588 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Sandra

Last Name: Thomas

Email Address: saundraleigh@yahoo.com

Affiliation:

Subject: A.B, 32

Comment:

I am proud that CA has taken a lead in the US in setting high and measurable standards for addressing the issues related to global warning. By doing so, we convey to others the importance of addressing these issues and show what is possible when there is the understanding and the will to do so. Please support this measure so that CA can continue to be an innovator and leader on this issue.

Sandra Thomas

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-02 18:44:03

No Duplicates.

**Comment 589 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: John

Last Name: Boesel

Email Address: [jboesel@calstart.org](mailto:jboesel@calstart.org)

Affiliation:

Subject: CALSTART comments on reduction targets, transportation, and technology

Comment:

CALSTART believes that the AB 32 Scoping Plan represents a good first step toward comprehensive climate policy in California. Our comments relate to (1) targets and assumptions, (2) the interaction of air quality and GHG programs, (3) the scope of the proposed cap and trade program, (4) technology innovation, (5) land use, (6) pricing policies, and (7) methane emissions.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1276-calstart\\_comments\\_on\\_draft\\_ab\\_32\\_scoping\\_plan\\_10-08.doc](http://www.arb.ca.gov/lists/sp-general-ws/1276-calstart_comments_on_draft_ab_32_scoping_plan_10-08.doc)

Original File Name: CALSTART comments on draft AB 32 Scoping Plan 10-08.doc

Date and Time Comment Was Submitted: 2008-10-02 19:15:44

No Duplicates.

**Comment 590 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Gabriella

Last Name: Condie

Email Address: gcondie@ci.san-leandro.ca.us

Affiliation:

Subject: City of San Leandro's Comments on the CARB Scoping Plan

Comment:

Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1279-mnichols.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1279-mnichols.pdf)

Original File Name: MNichols.pdf

Date and Time Comment Was Submitted: 2008-10-03 11:34:09

No Duplicates.

**Comment 591 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Angela

Last Name: Johnson Meszaros

Email Address: ccplan@arb.ca.gov

Affiliation: Co-chair of the AB 32 EJAC

Subject: FINAL Comments & Recommendations on AB 32 DRAFT Scoping Plan  
Comment:

see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1280-ejac\\_comments\\_final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1280-ejac_comments_final.pdf)

Original File Name: EJAC\_Comments\_Final.pdf

Date and Time Comment Was Submitted: 2008-10-03 11:37:39

No Duplicates.

**Comment 592 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Angela  
Last Name: Johnson Meszaros  
Email Address: cseghers@arb.ca.gov  
Affiliation: EJAC

Subject: EJAC  
Comment:

Please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1281-10\\_01\\_08\\_ejac\\_committee\\_comments\\_final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1281-10_01_08_ejac_committee_comments_final.pdf)

Original File Name: 10\_01\_08\_EJAC\_Committee Comments Final.pdf

Date and Time Comment Was Submitted: 2008-10-03 11:53:54

No Duplicates.

**Comment 593 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Laura

Last Name: Manning

Email Address: thrace\_44@yahoo.com

Affiliation:

Subject: Comments on A.B. 32 Scoping Plan

Comment:

Please include incentives and strong support for renewable energy, including solar, wind, and biofuel. Cap and trade is important, but should be clearly defined and monitored fairly. Non-point source emissions are one of the best places to address global warming emissions, and must also be clearly defined, and aggressively captured.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-03 12:12:18

No Duplicates.

**Comment 594 for General Comments for the GHG Scoping Plan (sp-general-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Hargrove

Email Address: mhargrove@cbpa.com

Affiliation: CA Business Properties Assn (CBPA)

Subject: Commercial, Industrial, Retail, Real Estate Industry Comments

Comment:

Comments from the Commercial, Industrial, and Retail real estate industry. Comments cover the Draft Scoping Plan, Appendices, and Economic Analysis. Please see also white paper submitted on Green Building Carbon Credits to use a market based approach to incent energy reductions in new and existing buildings. Thank you.

Matthew Hargrove  
Senior Vice President of Governmental Affairs  
California Business Properties Association  
1121 L Street, Suite 809  
Sacramento, CA 95814  
916-443-4676 phone  
916-443-0938 fax  
mhargrove@cbpa.com

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1285-ab\\_32\\_scoping\\_plan\\_comments\\_-\\_full\\_and\\_final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1285-ab_32_scoping_plan_comments_-_full_and_final.pdf)

Original File Name: AB 32 Scoping Plan Comments - FULL and FINAL.pdf

Date and Time Comment Was Submitted: 2008-10-03 13:04:16

No Duplicates.

## **Comment 595 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Matthew

Last Name: Hargrove

Email Address: mhargrove@cbpa.com

Affiliation: CA Business Properties Assn (CBPA)

Subject: Green Building Carbon Credits

Comment:

The California Business Properties Association (CBPA) is pleased to have the opportunity to comment on the California Air Resources Board's (ARB) Appendices to the Draft Scoping Plan. As indicated in CBPA's comment letter, we are providing ARB the enclosed white paper prepared by CBPA's Special Legal Counsel, Donald Simon, entitled "Green Building Carbon Credits: A Structure for Promoting Greater Energy Efficiency in the Real Estate Sector to Address Climate Change."

Mr. Simon verbally presented this concept at the recent September 2, 2008 meeting of the Green Building Climate Action Team Advisory Committee meeting. It was warmly received by attending representatives from both the private real estate industry and the non-profit public interest environmental community.

We ask ARB to thoughtfully consider the concepts outlined in this white paper, and we hope to schedule a meeting in the near future with appropriate staff to continue dialogue on this important opportunity that we believe would empower the real estate sector to help achieve California's goals under AB 32.

CBPA thanks you for your consideration of our views and for your continued hard work on this important issue. We look forward to working with you further.

Matthew Hargrove  
Senior Vice President of Governmental Affairs  
California Business Properties Association  
1121 L Street, Suite 809  
Sacramento, CA 95814  
916-443-4676 phone  
916-443-0938 fax  
mhargrove@cbpa.com

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1286-ab\\_32\\_scoping\\_plan\\_comments\\_-\\_green\\_building\\_carbon\\_credits\\_cover\\_and\\_paper.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1286-ab_32_scoping_plan_comments_-_green_building_carbon_credits_cover_and_paper.pdf)

Original File Name: AB 32 Scoping Plan Comments - Green Building Carbon Credits Cover and Paper.pdf

Date and Time Comment Was Submitted: 2008-10-03 13:06:40

No Duplicates.

**Comment 596 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Citizen

Last Name: Private

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: Clean air

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1287-9\\_28\\_08\\_janis.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1287-9_28_08_janis.pdf)

Original File Name: 9\_28\_08\_Janis.pdf

Date and Time Comment Was Submitted: 2008-10-03 13:59:00

No Duplicates.

**Comment 597 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Claudia  
Last Name: Haskell-Seidner  
Email Address: cseghers@arb.ca.gov  
Affiliation:

Subject: cap and trade  
Comment:

please see attached comment

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1288-9\\_30\\_08\\_haskellseidner.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1288-9_30_08_haskellseidner.pdf)

Original File Name: 9\_30\_08\_haskellseidner.pdf

Date and Time Comment Was Submitted: 2008-10-03 14:04:09

No Duplicates.

**Comment 598 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Rochelle  
Last Name: Frinere  
Email Address: pechka@cox.net  
Affiliation:

Subject: Climate Change  
Comment:

We MUST start turning climate change around before the inevitable  
becomes unsurvivable.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-04 05:06:47

No Duplicates.

**Comment 599 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Marc

Last Name: Gregory

Email Address: mg\_arles@yahoo.com

Affiliation:

Subject: global warming

Comment:

There can be no doubt that at least 80% of global warming is attributable to human activity. Dramatically increased fuel-efficiency for all vehicles (except hybrids), and sufficient funding, research and implementation now for clean, alternative energy sources is no longer a debatable option. It is an absolute necessity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-04 14:32:06

No Duplicates.

**Comment 600 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Big  
Last Name: Daddy  
Email Address: bigdaddy69\_77@yahoo.com  
Affiliation:

Subject: Clean Air  
Comment:

Without clean air we have nothing and neither will our children.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-07 01:29:11

No Duplicates.

**Comment 601 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Marlene

Last Name: Sheridan

Email Address: marlenesherdan@roadrunner.com

Affiliation: NRDC

Subject: Air Quality - California

Comment:

Strict regulation is required for continued air quality safety for  
the citizens of CA and, the global commitment to air quality.  
Marlene Sheridan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-09 11:18:39

No Duplicates.

## **Comment 602 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Arianna  
Last Name: Van Meurs  
Email Address: arianna\_vanmeurs@sbcglobal.net  
Affiliation: Consultant, Smart Growth

Subject: Recommendation for CARB's AB32 website  
Comment:

October 9, 2008

Dear Chair Nichols and Members of the Air Resources Board:

Thank you for the commitment you have made to implementing AB 32 which represents a critical milestone in addressing the overwhelming challenge of global climate change.

As a very interested bystander who is attempting daily to understand the most recent developments and twists and turns in this incredibly exciting, but extremely complicated process, I have an observation and a suggestion that I would like to make.

My observation is that you have tried to make this process transparent and your website has a wealth of information, but the California Climate Change Portal and ARB website have become unwieldy. It is extremely difficult for laypeople such as myself, who want to understand and support this process, to find the critical high-level pieces of information and to uncover recent developments and thus to support the process in whatever ways we have at our disposal.

My suggestion is that the ARB consider creating a more user-friendly website that allows and actually invites the kind of support from local governments, counties, regional governments, nonprofits, educational and private entities and individuals that the ARB will need if emission reduction goals are to be met. This new website would reach out and be user-friendly to a wide range of people, from those just familiarizing themselves with the issue of climate change to those who are on the forefront of writing the guidelines for how we'll achieve the targets in the various sectors. It could exist in conjunction with, embedded in, or separate from the existing website.

Generally, this website will help people with all levels of understanding of climate change get on the same page. It will clearly lay out the targets by sector and subsector. It will shamelessly reveal for each sector and subsector what the plans are, thus helping to engage more people in the effort. It will publish short-term actions and how various levels of the public and private sector can and will contribute to the effort. Perhaps most importantly, it will report on the progress that is being made, thus keeping the various players accountable and encouraging a larger number of people to be engaged.

For an example of this type of website, you can visit the website of a company called Visible Strategies (visiblestrategies.com) whose product 'see-it' attempts to fulfill the objectives mentioned above. While I have no relationship with this company other than as a participant in two of their webinars, they have an impressive list of clients including Lester Brown's Earth Policy Institute.

I recognize that the ARB staff resources must be stretched by the AB32 scoping plan and process. However, you have invested so much in this process that it would be a shame not to invest in a tool that would help to optimize the process for implementing the emissions targets. Such a website would also provide a window for other governmental and nonprofits worldwide to witness and to emulate the groundbreaking efforts underway in California.

Again, I thank you for your time.

In appreciation for all that ARB is doing,

Arianna Van Meurs

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-09 13:29:12

No Duplicates.

**Comment 603 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Donald  
Last Name: Landen  
Email Address: dlanden@comcast.com  
Affiliation:

Subject: Global Warming  
Comment:

Please support all efforts to reduce Global Warming. California has a reputation for being the leader in protecting our environment. If we continue to be the leader other states will follow our example.

Sincerely,

Donald Landen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-10 07:29:55

No Duplicates.

## **Comment 604 for General Comments for the GHG Scoping Plan (sp-general- ws) - 1st Workshop.**

First Name: Marcia  
Last Name: Armstrong  
Email Address: armstrng@sisqtel.net  
Affiliation:

Subject: Wildfire Impacts on Ozone  
Comment:

This year, north state California populations suffered greatly from the impacts of massive wildfires on air quality. For instance, Siskiyou County suffered "moderate" to "hazardous" air quality conditions. The Hoopa Tribe in Trinity County did a study of the relationship of air quality conditions to health services, showing a direct correlation.

Today, the Redding Record Searchlight published the following article on a study that determined a direct correlation between the wildfires and ozone. I submit this article as comment:

<http://www.redding.com/news/2008/oct/10/wildfires-increase-ozone/>  
Wildfires increase ozone  
Study: Unhealthy gas created near, far from blazes  
By Ryan Sabalow Friday, October 10, 2008

When it comes to wildfires, it's not just the hazy, smoke-filled air that's bad to breathe.

The pollution that can't be seen also can make you wheeze and cough, a study released Thursday found.

For the first time, the National Center for Atmospheric Research (NCAR) tied high, unhealthy ozone levels to wildfires.

Unlike the cough-inducing clouds of smoky particulate matter that clogged sight lines and airways this summer, ozone is an invisible, odorless, tasteless gas that can cause respiratory problems.

Although scientists have long known that wildfires can affect air quality by emitting particles and gases into the air, there has been little research to quantify ozone levels.

"There's long been a hypothesis that ozone levels are affected by fires and generally there's been an assumption that some of the gases released do cause ozone levels to go up," said John Waldrop, senior air pollution inspector with Shasta County Air Quality Management District.

But that was never proven until NCAR scientists used data from fall 2007 in wildfire-besieged Southern California to discover that fires released nitrogen oxides and hydrocarbons, which can form ozone near the fire or far downwind as a result of chemical reactions in sunlight.

The study found that rural communities with normally healthy air suffered.

California witnessed an intense wildfire season in 2007 with drought conditions and unusually powerful Santa Ana winds fanning flames. More than 9,000 fires blackened over a million acres statewide and destroyed more than 2,000 homes.

Using computer models and data from 55 rural ground monitoring stations, NCAR found that drifting smoke from wildfires sent ozone pollution to unhealthy levels in 66 instances, about triple the usual number.

NCAR scientist Gabriele Pfister said her study was expanded this summer to sample data above and around the massive fires that burned in the north state, but the data from that analysis hasn't been computed yet.

But she expects to see that air quality in the north state is much worse, since ozone levels spike on sunny days.

"You definitely have a lot more sunlight around in June and July than you do in September and October," Pfister said.

On June 21, a freak lightning storm sparked about 300 fires in the north state. Many burned for months.

Waldrop said that the smoky skies caused by the fires seemed to actually keep ozone levels down, since the blanket of particles blocked out the sun's rays.

Even so, between June 14 and Aug. 14, Shasta County's air violated the state eight-hour standard for ozone 17 times.

Reporter Ryan Sabalow can be reached at 225-8344 or rsabalow@redding.com.

The Associated Press contributed to this story.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-10 14:21:41

No Duplicates.

**Comment 605 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Joint NGO

Last Name: Letter

Email Address: rkatz@pacificforest.org

Affiliation:

Subject: Forest sector climate policy and AB 32 implementation process

Comment:

Thank you for the opportunity to comment. Attached is a joint letter on the forest sector policy implementation process under AB 32, submitted for your consideration by Audubon California, California Council of Land Trusts, California Trout, Defenders of Wildlife, Ebbets Pass Forest Watch, Environmental Defense Fund, ForestEthics, Sierra Club California, The Nature Conservancy, California, The Pacific Forest Trust, The Wilderness Society, Transportation and Land Use Coalition, and the Trust for Public Land.

Attachment: [www.arb.ca.gov/lists/sp-general-ws/1316-carb\\_joint\\_ngo\\_process\\_ltr\\_final.pdf](http://www.arb.ca.gov/lists/sp-general-ws/1316-carb_joint_ngo_process_ltr_final.pdf)

Original File Name: CARB Joint NGO Process LTR\_final.pdf

Date and Time Comment Was Submitted: 2008-10-10 17:04:48

No Duplicates.

**Comment 606 for General Comments for the GHG Scoping Plan (sp-general-  
ws) - 1st Workshop.**

First Name: Claire

Last Name: Chambers

Email Address: csc2938@comcast.net

Affiliation:

Subject: Clean Air is So Important for all of us

Comment:

Please help keep California moving forward as a clean-air advocate  
- do whatever you can.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-12 18:06:57

No Duplicates.

**There are no comments posted to General Comments for the GHG Scoping Plan (sp-general-ws) that were presented during the Workshop at this time.**