June 25, 2015

Public Comment Submission from: Alan Scott 1318 Whitmore Street Hanford, CA 93230-2848 email: [a\_scott1318@comcast.net](mailto:a_scott1318@comcast.net)

Re: Greenhouse Gas Reduction Fund Guidelines

It is without question and absolutely imperative that the Air Resources Board formally extend the time for responses to at least 45-days; however, 60-days would be more appropriate in this case as except for those on the webinar, this appears to be a major mystery to the entire state. Accountability and transparency are just as few of the many requirements the taxpayers in California demand and this process meets none of these two conditions.

Additionally, request immediate posting of the video transcript from June 22, 2015 session on your web site. Posting this media is just the beginning of the statewide notification to citizens.

Furthermore, a more aggressive plan for additional statewide workshops must be developed and presented to the citizens of California. It is abundantly clear the complexity of all Cap & Trade legislation (including this Funding section) requires a massive outreach to the entire state. Resultant of these workshops is basic; it will reduce issues, increase public knowledge, and allow for quality comments from more than just a few citizens (however, I fully realize that is exactly what the ARB wants). Failing to honor this request further proves the perception that ***clandestine operations*** are a key component of this legislation from inception to enactment. A most favorable response is anticipated, especially to ensure that compliance will be achieved for all disadvantaged communities as well as all other communities in the state under the current Environmental Justice requirements of California Environmental Quality Act.

Currently, this process has the appearance of a ***'flash in the pan move'*** when the designated response windows are extremely questionable, while it appears, the Board has aggressively enacted restrictive window for quantifiable public comment.  In reviewing, my submission written on June 25, 2015, there is significant confusion whether comments are due June 29, 2015 or open until July 13, 2015. Clarity works when it is clear and you ARE NOT providing quality messaging to the citizens.

Nevertheless, the ARB will have a final document approved 14-days after close of public comments with the Final Document to be released on July 13, 2015. Due the Independence Day holiday period, the state will not be working 3-days thus leaving only 11-days to complete the Final document. I surmise that indicates the final document is already completed and ready for release today. Now with the questionable update today, what is the anticipated release date for the Final Document?

This legislation is a massive intrusion into the entire state and your presentation on Monday does not even satisfy a scintilla of PROPER notification or education.  Unless provided to the entire state through local onsite workshops, the pending disasters, in my mind, will be significant, detrimental, and extremely costly.

The state shall provide proper notifications through aggressive local events (as noted earlier in this submission) to limit failures of compliance. Right now, that is the missing link called ARB once again, the totally lack of transparency!  Compliance failure especially specific to the Environment Justice Requirements, without question, only induces legal actions and that is just the beginning salvo. Let us remember that not reading and not knowing what is in any legislation creates only confusion along with a serious drain of taxpayer dollars for shoddy work product. Remember, poor planning coupled with poor execution only results in one outcome, the “Unintended Consequences Environment”. California government is well known for spending most of its time in this morass wasting time and costing money - huge amounts of it, for once again, poor planning, et al…

All libraries throughout the state must be provided with at least one hard copy of the policy and at least two CD's for usage at the library (more for the larger communities).  Moreover, the library should have a disk that allows patrons to copy for use at home or their place of business.

Accountability, transparency, fiduciary compliance, and timely and effective communications are just some of the key methodologies to achieve success, if C & T has strength and validity.

**Question:**

Since the California High-Speed Rail Authority is a 30-plus year polluter, and the Air Resources Board is **CHARGED WITH THE REQUIREMENTS OF STRICT ADHERENCE TO ALL TYPE OF POLLUTION**, why is the Authority in receipt of C & T funding? Could this be one of those backroom exceptions?

Then the question becomes, if someone is a recipient of C & T funds then they must be in total compliance with the standards and by their own admission, they are a 30-year actual producer of pollution. I am requesting solid justification as to why any C & T monies are being channeled to fund CAHSRA. Furthermore, this entire project is a fiduciary nightmare and known to almost everyone involved. Therefore, why continue to support a lame goose of a project? More important, I am aware of the $35 million dollar mitigation payment for Construction Packages 1, 2, & 3 ostensibly to mitigate Valley Fever and the inducement of particulates into the atmosphere during the construction of this project. Quite frankly, I am sure if this ever gets to completion, it will not achieve stated benchmarks because the unknowns are monumental based on very flawed design.

Just to be clear, I fully realize your response to the above would go something like this “By providing funding, it will assist in the reduction and / or mitigation of greenhouse emissions and that response requires a lot more substance. To wit: complex response to these questions how, where, what, when, who, why, and how many is what is required. Unable to respond in this manner demonstrates that substance is not the factor but expedient political legacy directions overrule Proposition 1A for starters.

Frankly, I am very distressed with government especially when it takes liberties to suit their questionable agendas. However, these opportunities typically will never be made available anyone outside of government.  California Environmental Quality Act (CEQA) comes to mind right now was waived to build a basketball arena in Sacramento is one example that comes to mind??? Nevertheless, private industry and citizens will never be afforded this same luxury.  Furthermore, the state legislature has produced very comprehensive quality guidelines to ensure California remains nearly free and clear of manmade pollutants. Hence, the very reason why CEQA is seriously more stringent than the National Environmental Protection Act (NEPA). Yet because of a **'pet'** project and in the case of Cap & Trade **'a bogus tax or fee grab'** just to fill the coffers for **'pet'** projects.

Between the HSR Authority and the Air Resources Board, you both are imposing draconian mandates without proper vetting to the taxpayers.  One or two clandestine meeting or limited workshops, etc…does not satisfy the requirements of total public notification.  Apathy on the part of government once again only leads to dysfunction and significant fiscal miscalculations.

What is extraordinary is the state can move rapidly for the basketball arena located in an area where it would be extremely difficult for all California’s to utilize. However, the more pressing question is why are pet projects and legislation run through without a single blip but for decades leadership has been unable to solve one of the most pressing problems in this state – **WATER STORAGE AND SOLUTIONS FOR THE CYCLE OF KNOWN DROUGHT PERIODS**.

The ARB are stewards of our tax dollars any blatant misuse for the gains of **"pet projects"** is very unacceptable.  I would ask that a comprehensive PUBLIC review be convened to address these specific issues and any other similar waivers specific to government projects.  Continuity and compliance eliminate disaster, especially expensive ones that will always fall hard on the taxpayer.

Alan Scott