



December 10, 2008

Mary Nichols, Chair

California Air Resources Board

1001 “I” Street

Sacramento, CA 95814

RE: Climate Change Proposed Scoping Plan

Dear Ms Nichols:

Thank you for the opportunity to participate in the development of the Climate Change Scoping Plan (Scoping Plan). We support the efforts of the California Air Resources Board and the goals outlined in AB 32. Our collective organizations have found great value in participating with the development of this landmark program contained in the Scoping Plan. With so much attention and regulatory activity dedicated to the goods movement sector, it is important that we get it right and keep goods moving cost-effectively into and out of California.

We recommend that the plan focus on the most cost effective CO2 reduction strategies first, and that requirements that are not technologically feasible near term or not cost effective within regional transportation cost structures be pushed back towards future years much closer to the 2020 time frame.

Specifically, we believe the following recommendations should be incorporated into the plan:

1. Take diesel fuel and goods movement related transportation out of the declining cap.
2. Adopt a renewable portfolio standard (RPS) of 33% exclusively for regulated utility contracts and spot market purchases. Develop a protocol for commercial warehouses and distribution centers to generate carbon credits, allowances or offsets as early action items.
3. Limit adoption of a Low Carbon Diesel Fuel Standard until in later years of the programs when the technology is commercially viable and in western states
4. Cap and Trade is critical to the Scoping Plans success and identified offsets are necessary for near term cost containment.

Our detailed comments are attached and again we appreciate the opportunity to participate in the

development of the Climate Change Scoping Plan.

  Stephanie R. Williams

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