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California Air Resources Board (CARB)
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Sir or Madam:

For your consideration, I submit the below points regarding the AB 32 Scoping Plan.

No provision which permits a company, industry, and/or other commercial enterprise (entity) to exceed what will be the State's established air quality standards by means of an offset, cap-and-trade or other mechanism (tradeoff) is consistent with AB 32, unless the CARB can quantitatively demonstrate that such tradeoff will ensure that the overall reduction for that specific area within which the subject entity is located will meet the standard. Example: The daily average emission of each Green House Gas (GHG) in Sacramento is established from which to measure the future reduction requirements. It is determined that Company A is contributing, on a daily average, 20% of the area's total carbon monoxide (CO) emissions. If the air quality standard requires Company A to lower its average daily CO emissions by 8%; however, it is only able to lower it by 4%. Company A should be required to file a request to cap-and-trade; pay Company B to meet the unrealized 4%; pay a fee that would cover the CARB's cost to administer the trade, and then the CARB would monitor the trade to ensure that Company B was making up for that 4% reduction that was not met by Company A.

Any provision that permits an entity to tradeoff an air quality standard, without requiring that the overall effect will be a reduction in the GHG emissions for that area, is not consistent with AB 32. No program of tradeoffs will be effective unless there is a quantifiable system of monitoring the total reduction of emissions within each area to ensure that the GHG emission reduction standards will be met.

Additionally, all financial burdens resulting from the administration of any tradeoffs should be borne by the responsible entities and not the general public.

I ask that the CARB also increase the emission reduction targets for local governments, especially for those emissions that are the result of poorly planned transportation systems and/or growth which act to increase the number of vehicle hours on roadways.

The CARB should also establish standards that will require both private and State entities to recycle materials and to take other actions which will minimize their contributions to land fills, and their use of forest and other products that result in reduced air quality and an increase in global warming.

Respectfully,

Tony Loftin
Chair, Sacramento Group
Sierra Club