November 20, 2008

Mary D. Nichols, Chairman California Air Resources Board Headquarters Building, 1001 "I" Street Sacramento, CA 95812

Dear Chairman Nichols.

We, the undersigned, are writing on behalf of California Interfaith Power and Light (CIPL) to urge 100% auction of allowances in the AB 32 Proposed Scoping Plan.

We applaud California and the Air Resources Board for taking action on this critical issue by passing AB 32, the California Global Warming Solutions Act of 2006, and releasing the Proposed Scoping Plan to ensure its successful implementation and believe it delivers critically needed air quality and public health improvements, as well as safeguards to protect our natural resources. The plan puts California on a path to reduce global warming emissions by 30% by 2020 as required by AB 32. It also emphasizes the importance of developing a green economy workforce and the benefits to California's overall economy that will come from a transition to a green technology.

CIPL is a broad coalition of religious organizations representing over 500 California congregations. Nationally, Interfaith Power and Light is over 4000 congregations strong and growing. We consider global warming to be the moral issue of our time and believe that not mandating 100% auctions of allowances is detrimental to achieving the goals of AB 32 and does not adequately protect California's most vulnerable populations.

Auctions of carbon allowances within a cap-and-trade system require polluters to pay for using our shared resources, rather than handing them windfall profits. Revenue from auctions can then fund programs to assist vulnerable communities in coping with rising energy costs, such as low-income home weatherization and energy bill payment assistance. This revenue is also needed to fund green jobs training to allow low-income communities to fully participate in the new clean energy economy.

While we are pleased to see that the Proposed Scoping Plan has an eventual goal of full auctions, we believe the use of 100% auctions should be immediate in order to effectively and justly fulfill the goals of AB 32. Our health, our resources and our citizens most affected by higher energy costs and pollution cannot afford a delay. Thank you for considering our comments. We look forward to continuing to monitor and advocate for the full implementation of AB 32. Please let us know if there is anything we can do to further support its success.

Rev. Charlotte W. Myers California Interfaith Power and Light State Program Director

Ms. Betsy Reifsnyder Catholic Charities of Stockton Dioceses Environmental Justice Coordinator