

Catholic Charities
Diocese of Stockton

Betsy Reifsnider
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Help for Today...
Hope for Tomorrow 11/20/08

G. Richard Fowler
Executive Director

November 20, 2008
California Air Resources Board
Headquarters Building
1001 "I" Street
Sacramento, CA 95812

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Stockton Pathology Medical Group

Dear Members of the Air Resources Board:

On behalf of Catholic Charities, Diocese of Stockton, I wish to submit comments on the AB 32 Scoping Plan. The Stockton Diocese was one of many religious organizations that worked for passage of AB 32 in 2006.

The Stockton Diocese based its review of the AB 32 Scoping Plan on the directive from the U.S. Conference of Catholic Bishops -- that "a central moral measure of climate change legislation is how it affects the poor and vulnerable."

We commend the Air Resources Board and staff for their excellent work and tireless efforts on the Scoping Plan. We urge you to strengthen the Plan by making the following changes:

I. Implement the Indirect Source Rule statewide.

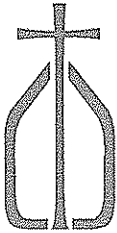
Thanks to the passage of SB 375, California is starting to recognize land use as a critical element in mitigating global climate change. However, it is only a first step. The Air Resources Board should adopt the Indirect Source Rule, now in effect in the San Joaquin Valley, on a statewide basis.

The ISR will help local governments implement SB 375 at the project-specific level. The ISR has already proved to reduce air pollution and greenhouse gas emissions in the short term. The ISR should be applied to rural counties currently excluded from SB 375. The Air Resources Board should have a rulemaking process to develop guidelines for a statewide ISR that sets as a minimum standard the best elements of the landmark San Joaquin Valley rule for criteria pollutants.

The Stockton Diocese was an early supporter of the ISR in the San Joaquin Valley. We have experienced its effectiveness firsthand. Local parish building campaigns have complied with the IRS. Not only have our parishes made their new facilities more energy efficient and economical, but they have also benefited the surrounding community with improved air quality. The Stockton Diocese strongly supports expanding the ISR statewide.



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II. Auction all carbon allowances.

To guarantee that carbon is priced fairly and that the public at large benefits from any carbon-capping program, we urge the Air Resources Board to auction 100% of carbon allowances. Polluters should pay the full cost of the pollution they create.

III. Insure that revenue generated by carbon reduction strategies is invested in green jobs.

To make sure that no one is left out of California's clean energy future, we urge the Air Resources Board to designate part of allowances and revenues from auctions for green job training and education programs, especially in low-income communities.

There should also be a dedicated stream of carbon proceeds for assistance to low-income communities, helping them adapt to AB 32 requirements through intensive energy efficiency programs, transportation alternatives, and bill payment assistance.

Again, we commend the Air Resources Board and staff for the AB 32 Scoping Plan. Thank you for the opportunity to comment.

Sincerely,

Betsy Reifsnider
Environmental Justice Coordinator
Catholic Charities, Diocese of Stockton



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