Members of the California Air Resources Board:

I am Donald Lee of the San Diego Sierra Club Global Warming Committee. I congratulate the California Air Resources Board for its thoughtful draft scoping plan. I believe most of the plan is excellent, as far as it goes. But, given that scientists suggest that the goals of the plan may already be too modest and too slow to save us from the disastrous consequences of global warming, I urge that you strengthen the plan in the many areas recommended by Sierra Club California. I only have time to address one of those areas.

I am concerned that you take into account the full life-cycle of emissions. For instance, the California Public Utilities Commission interpretation of SB 1368 would allow about five million tons of greenhouse gas per year for each liquid natural gas terminal to go into the atmosphere without being counted as part of the state's carbon emissions. That is about the equivalent of a million cars, from each terminal, not accounted for.

Sempra Energy plans to bring liquefied natural gas from Indonesia to its terminal in Mexico and use it to generate electricity in Mexico for California. This raises several problems:

- (1) Foreign as well as domestic natural gas emissions at terminals whose energy will be used in California should be taken into account.
- (2) It will create a greater greenhouse gas burden to liquefy the gas, transport it across the ocean, and regassify it than it would to use domestic gas. Use of local renewable resources would be even better.
- (3) I asked a member of the California Air Resources Board how the greenhouse gas burden of California energy generated in Mexico from Indonesian gas would be accounted for. I was told that California had no authority over foreign sources. California would have to rely on voluntary reporting by Sempra, Mexico, and Indonesia.

I urge California not to rely on easily manipulated voluntary reporting. I urge California, by some combination of legislation, stricter regulation, and carbon fees on imported energy to encourage energy companies like Sempra to turn away from carbon emitting natural gas to renewable local resources such as wind and solar power.

Donald C. Lee

Thank you,