

Sept. 15, 2008

From: Global Warming Committee, San Diego Sierra Club  
8304 Clairemont Mesa Blvd., # 101  
San Diego, CA 92111

To: California Air Resources Board  
Office of Climate Change  
1001 I Street  
Sacramento, CA 95812

Re. Climate Change Draft Scoping Plan

Dear Members of the California Air Resources Board:

We congratulate you on your Climate Change Draft Scoping Plan. It is a comprehensive and detailed work which impresses us favorably with the effort that went into it, and it encourages us. We have learned about many areas of which we had limited knowledge. Nevertheless, we have a few areas of concern with the Appendix which we hope you will address in your continued revision of the Plan.

(1) Re. pp C-127, 162, and 164: In the area of biofuels, there is no critique of ethanol. Your report is written as if CARB members were not aware that corn-based ethanol has been criticized by scientists as having a greater carbon footprint than the fossil fuels it is meant to replace, when taking into account the manufacture and shipping of fertilizer, use of farming machinery, use of water for irrigation, transportation and processing of the crop, etc. This is apart from other concerns, such as environmental justice, the rise of food prices world-wide, etc. We urge that California not switch its whole CHP fleet to corn-based ethanol fuel without looking into the scientific research more carefully.

(2) Re. p C- 171: Natural gas is referred to as a "renewable resource". It is not a renewable resource; it is a fossil fuel that contributes to global warming. The confusion may be because natural gas is mostly methane, plus some propane and other gasses, while gasses produced from land-fills and organic waste digesters are also methane. The latter are renewable resources, not to be conflated with the fossil fuel. It worries us that your calling natural gas a renewable resource will make it easier for the natural gas producers to con the public into thinking their product is less greenhouse polluting than it is.

(3) Re. p C- 41: We urge that land use planning should include more in-fill and multi-use zoning to put housing, shopping, jobs, schools, etc. into the same areas (like cities used to be), so that people don't have to drive so far. Of course, smart zoning must still be used, for instance, to keep polluting businesses away from residences and schools. This would require rethinking suburban design (as is being done in some places) and revising zoning laws. With an aging population that would like more public transportation, there is evidence that there is already demand for in-fill and multi-use zoning.

(4) Re. p C- 155: Your treatment of agriculture concentrates on large dairy methane capture. This is a good start, but much too timid. Agriculture needs to be

revolutionized (see the publications of such groups as Food First). You only mention conservation tillage once in passing. Conservation tillage and non-tillage technologies could save a great deal on water and fertilizer usage. Ending monoculture and using organic farming techniques can increase crops while reducing pollution and water waste. The state could encourage a revolution in agriculture with wise use of subsidies and education. We hope you will expand your research in these areas.

(5) Re. p C-87: You note that since the public good charge for water would be a flat rate per connection and would not be based on the amount of water used, it would not significantly reduce water use. Why not base a fee on amount of water used in order to reduce usage?

Thank you.

Sincerely yours,

*Donald C. Lee*

DONALD C. LEE, Co-CHAIR

*Jean F. Costa*

Jean F. Costa, Co-chair

Global Warming Committee, San Diego Sierra Club