

September 29, 2008

Ms. Mary Nichols
Chair
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Subject: Comments on Draft AB 32 Scoping Plan Document—Energy Efficiency

Dear Ms. Nichols:

Weston Solutions, Inc. (WESTON®) appreciates the opportunity to submit comments on the Draft AB 32 Scoping Plan Document. Climate Change is a serious global problem that poses significant challenges. This Draft AB 32 Scoping Plan Document provides a road map for the state of California and the Air Resources Board to comply with AB 32 greenhouse gas (GHG) emissions reductions goals.

WESTON offers the following comments regarding the Draft AB 32 Scoping Plan Document's strategy to address GHG emissions through energy efficiency measures and kindly requests they be considered for incorporation into the Proposed Scoping Plan Document.

Municipalities have potential for large gains in energy efficiency by switching to LED street lighting and traffic lights. Towns and cities that have implemented these measures have seen payback periods of around 4 years. Because of the large opportunity this represents, the Scoping Plan should consider explicitly identifying LEDs as "first tier" energy efficiency solutions.

Thank you for your consideration of our comments.

Sincerely,

Susan E. Lorenz
Project Scientist
Sustainability Team
Weston Solutions, Inc.