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

August 1, 2008

Re: AB 32 Draft Scoping Plan and Appendices

Dear Ms. Nichols:

I have reviewed the June 2008 Draft Scoping Plan released for California's Global Warming Solutions Act of 2006 (AB 32). In response, I write today in support of comments submitted by the Natural Resources Defense Council ("NRDC") on the use of Low Impact Development ("LID") practices to reduce greenhouse gas ("GHG") emissions. The LID comments were included as a section of a package submitted by NRDC as comment on the Water Sector of the Draft Scoping Plan. In my experience, LID practices represent a superior method of water pollution abatement and means of preventing damage to aquatic habitats associated with urban development, and present a previously untapped means of reducing GHG emissions that result from the use of energy-intensive, imported water sources in California. Because LID emphasizes measures that maximize infiltration, which recharges local and regional groundwater systems, and capture or harvest of rooftop runoff for irrigation or other reuse, LID has the potential to significantly increase the availability of local water supply. This increased local supply can then be used to offset the need to supply water through more energy-intensive sources, thereby reducing the energy required to supply water and its associated GHG emissions.

LID site design techniques are cost-effective, can be implemented at a variety of scales and development types, and result in multiple benefits to both developers and the community at large. NRDC's analysis of the potential benefits in GHG emission reductions that can be realized through LID presents a compelling argument for its use throughout the state. Therefore, I support their comments on LID, and urge that the Air Resources Board require LID to be implemented at future development and redevelopment in California.

Sincerely,



Dr. Richard R. Horner