

November 20, 2008

Chairman Nichols and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Dear Chairman Nichols and Board Members,

AB 32 states, “The State Air Resources Board is the state agency charged with monitoring and regulating sources of emission of greenhouse gases that cause global warming in order to reduce emissions of greenhouse gases” (Section 38510). However, many measures in the Scoping Plan will be developed and carried out, at least in part, at other state agencies.

To clarify ARB’s role and ultimate responsibility, we ask that you add the following paragraph to Part I, Section B (5) (“Implementation of the Scoping Plan,” pg 9-10), and to Part IV, Section C (“Implementation of the Plan,” pg 104-106):

“ARB, in consultation with relevant governmental agencies, will estimate the measurable GHG benefits that are expected to be achieved through the implementation of the Plan's recommendations. To maximize benefits, promote consistency in accounting and avoid double counting across sectors and sections of the Plan, ARB will also provide oversight regarding how policy recommendations should be implemented, as it is likely that the implementation of certain policy measures could fall under the jurisdictions of different agencies and local governments. In addition, ARB will maintain responsibility for the corresponding protocols and accounting standards of climate measures to ensure that these policies lead to real, measurable, enforceable, verifiable and permanent climate benefits.”

Thank you for your consideration of this request.

Sincerely,

Californians Against Waste

Center for Biological Diversity

Natural Resources Defense Council

Sierra Club

The Nature Conservancy

The Wilderness Society