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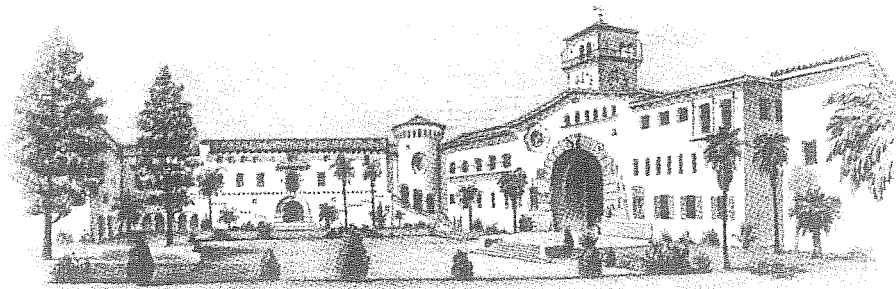
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COUNTY OF SANTA BARBARA

November 27, 2007

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

Dear Ms. Nichols:

The Santa Barbara County Board of Supervisors is concerned about the proposed approach to implementation of the California Global Warming Solutions Act of 2006 (AB32). We understand that the Air Resource Board (ARB) proposes an implementation strategy that would require an addition of approximately 100 staff to the Air Resource Board's existing staffing level. This strategy is especially concerning in light of Governor Arnold Schwarzenegger recent order to all state departments to draft plans for deep spending cuts after receiving word that California's budget is facing a significant deficit. Historically, as the State taken measures to reduce its budget, our budget and local programs have been significantly impacted; therefore, we become greatly concerned as we identify programs that needlessly increase costs to taxpayers.

A staffing increase of this magnitude would not be necessary if the ARB fully utilized local air districts for the implementation. Local air districts already have the requisite staff and expertise to implement AB32. Local air districts are vital to implementing the AB32 mandates in the most efficient manner based on the following considerations:

- Air district staff has extensive knowledge of the greenhouse gases (GHG) sources subject to the AB32 reporting requirements, thus ensuring the necessary level of data detail and integrity.
- As public agencies, data verification by the local air districts will be truly independent, as opposed to a verification process where the verifiers are hired by reporting facilities.

- The existing interaction between the local air districts and the facilities subject to the GHG reporting requirements will result in the collection of consistent and accurate data for the emissions of toxic pollutants and GHGs.
- Computer industry standard technologies and methodologies (e.g. web services, XML specifications, etc.) are readily available to ensure secure, seamless data exchange of facility information to both the ARB and air districts simultaneously.
- The local air districts can assist in the implementation of voluntary credit and/or cap-and-trade emission reduction programs, producing reliable data for baseline purposes and applying enforceable conditions in facility permits to document GHG emission reductions.
- Since many local air districts already have reporting and data management systems in place that can be adapted to the GHG emission reporting requirements, it will be easier to use these systems than to implement an entirely new system at the ARB. In addition, these systems can be provided at little or no additional costs; thus, ultimately saving money to the taxpayer.
- Because of the likely future involvement of the local air districts in the implementation of the climate protection program due to the regulatory and enforcement framework of AB32, we believe that the foundation for this type of cooperation must be built now.

Over the last several months, representatives from the California Air Pollution Control Officers Association (CAPCOA) have had several meetings with ARB staff to discuss the role of local air districts in mandatory reporting. CAPCOA has provided ARB revisions to the draft regulation to show what changes would be needed to implement their suggestions. We believe that these proposed changes, aimed at utilizing the existing expertise and resources of local air districts, will provide for an efficient and cost-effective reporting process, proactive cooperation and interaction between affected parties, and enhanced coordination of the implementation of AB32.

To our knowledge, these suggestions have not been incorporated into the draft regulation.

We appreciate the opportunity to provide the ARB with these suggestions and urge the ARB to consider an approach to AB32 implementation that fully utilizes the efficiencies of our local air districts.

Sincerely,

Brooks Firestone, Chair
Santa Barbara County Board of Supervisors