

**ACEC**  
AMERICAN COUNCIL OF ENGINEERING COMPANIES  
California

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December 5, 2008

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

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Executive Director

Dear Ms. Nichols:

Our statewide organization of 1100 engineering and surveying firms is very concerned about the economic impact of the Board's proposed AB 32 scoping plan. We are already in the midst of very difficult economic times. Needed public works, housing and other projects of all types are already being halted around the state. The scoping plan will, we fear, make the problem even worse.

Our members provide engineering, surveying, environmental, and construction management services for public works, housing, and commercial projects. They are mostly small firms averaging just 20 employees.

The proposed scoping plan will add costs to projects, delay projects, create uncertainty about projects and accelerate the abandonment of needed projects. Firms that have never previously had to lay off employees—the vast majority of whom are well-trained, productive employees—are doing so now. By discouraging projects, the scoping plan will cause even more layoffs.

We urge the Board to postpone taking action on the proposed scoping plan, make a full and accurate analysis of the plan's economic impacts, and pursue lower cost strategies, including cap-and-trade, for improving our environment.

Thank you for considering our comments. If you or a member of your staff has any questions, please let us know.

Sincerely,



Paul Meyer  
Executive Director

ORIGINAL:  
Copies:

Board Clerk  
Executive Officer  
Chair

