

April 27, 2009



Jon Constantino, Manager
Climate Change Planning Section
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Comments re: Administrative Fee Regulation

Dear Mr. Constantino,

The American Lung Association in California appreciates the opportunity to comment on the Administrative Fee regulation.

The American Lung Association in California supports the implementation of the administrative fee to support the important work of the California Air Resources Board and other state agencies as they administer and implement AB 32 programs. We also strongly support the need to pay back funds that were borrowed to support AB 32 work over the past two years.

As we have stated in public workshops on this issue, we feel that the administrative fee regulation is strongly needed to fund the range of work being conducted at agencies in support of AB 32, including additional public health reviews of AB 32 measures. Specifically, there is a need to provide staffing and technical support for the public health working group that is currently being developed pursuant to the board resolution adopting the Scoping Plan, as well as for the public health group being developed under the state's Climate Action Team. Because a significant portion of these two groups' work will be involved with AB 32 implementation, we recommend that a portion of the proposed administrative fee should be allocated to both the California Air Resources Board and the California Department of Public Health to assist with formation and staffing of the public health groups.

The fee is an important step to ensuring that CARB maintains momentum toward meeting the state's greenhouse gas reduction goals while also requiring emission sources to support this work. We are pleased that this measure is moving toward adoption and look forward to working with you to ensure public health reviews are supported through the fee.

Thank you again for the opportunity to comment on this key regulation.

Sincerely,

Will Barrett
Air Quality/Global Warming Policy Coordinator