**ARB Scoping Study 2022 should update GHG inventory methods to include all significant sources of statewide emissions, including maritime and aircraft fuel sales in-state**

* Scoping Study 2022 should update methods to include each significant source of GHG emissions in the statewide GHG inventory as originally intended under AB32.
* AB32 directs the Air Resources Board to “take into account the relative contribution of each source or source category to statewide greenhouse gas emissions” [section 38561(e)].
* However, prior AB32 inventories have failed to include emissions from the in-state sale of maritime and aviation fuels.
* These emissions are missing from the inventory that defines the Statewide GHG Emissions Limit.
* As a result, these data are not easy to locate by state and local policy makers, and members of the public, seeking to understand the true and full scope of California’s most significant sources of GHG emissions.
* ARB and other state agencies do not have the authority to directly *regulate* maritime or aircraft engine efficiency standards, but lacking direct regulatory authority doesn’t mean ARB should simply ignore these emissions.
* California agencies similarly lack the authority to regulate building heating and cooling equipment efficiencies, but ARB doesn’t exclude emissions from operating these federally regulated appliances from the statewide GHG emissions limit.
* *Regulatory* preemption should in no way affect ARB’s *informational* duty under AB32 to collect and report all significant source emissions, particularly these which are growing rapidly, and where state and local jurisdictions may have land use or other powers beyond Federal authority.
* The California Natural Resources Agency finds that for informational purposes, the geographic scope of an analysis of vehicle miles traveled may extend beyond an agency’s ability to regulate the impact: “CEQA requires analysis of a project’s impacts, regardless of whether the impacts are within the agency’s jurisdiction”. FINAL STATEMENT OF REASONS - AMENDMENTS TO THE STATE CEQA GUIDELINES (Exhibit A, Response 23.8, p.120).
* AB32 requires ARB to use “best available economic models, emission estimation techniques, and other scientific methods” [section 38561(d)].
* The collection and reporting of aviation and maritime transportation emissions information is clearly recommended as inventory best practice by both the IPCC GHG Inventory guidelines (for nation states) and the ICLEI US Community protocol (Appendix D, TR-6B and TR-7A).
* If ARB believes that there are flaws in these protocols that require ARB to deviate from following them in California, then these findings should be made explicit in the Scoping Study Update.