



Pillsbury Winthrop Shaw Pittman LLP  
50 Fremont Street | San Francisco, CA 94105-2228 | tel 415.983.1000 | fax 415.983.1200  
MAILING ADDRESS: P. O. Box 7880 | San Francisco, CA 94120-7880

John T. Hansen  
tel 415.983.1380  
john.hansen@pillsburylaw.com

September 23, 2009

Ms. Mary Nichols, Chairperson and  
Members of the Air Resources Board  
c/o Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Title 17. California Air Resources Board

Notice of Public Hearing to Consider Adoption of a Proposed AB 32  
Cost of Implementation Fee Regulation and Proposed Amendment to  
the Existing Regulation for the Mandatory Reporting of Greenhouse  
Gas Emissions

Date: September 25, 2009  
Time: 8:30 a.m.

Dear Ms. Nichols and Members:

**Summary of the Issues**

This office represents the California Business Properties Association, California Chamber of Commerce, California Independent Oil Marketers Association, California League of Food Processors, California Manufacturers & Technology Association, California Small Business Alliance, California Taxpayers' Association, Howard Jarvis Taxpayers Association, National Federation of Independent Business - California, California Black Chamber of Commerce, and Western States Petroleum Association (collectively, the "Associations"). The Associations submitted requests

62

Clerk of the Board  
September 23, 2009  
Page 2

for public records under the California Public Records Act, Govt. Code § 6250 et seq. (PRA Requests), dated February 13, 2009 and May 28, 2009, and this led to litigation in the Sacramento County Superior Court entitled *California Business Properties Association, et al. v. California Air Resources Board*, Case No. 34-2009-80000232. Our office has submitted to you, under separate cover, an Index of Legal Documents, including the Court's Order filed September 18, 2009, from that proceeding.

This Board faces a very significant policy issue, as well as a number of substantial issues under the California Administrative Procedure Act (APA) and AB 32 and incorporated statutes, as outlined below, due to the lack of transparency and lack of production of facts, financial information, and proposed and actual budgets relating to the amount of the proposed fee and nexus with the regulatory programs encompassed within AB 32.

Since May 7, 2009, CARB staff has been asserting that it can withhold facts, financial information, numbers, and estimates (defined as "rough or approximate calculations") because its "facts were so *closely intertwined* with material reflecting staff's deliberative process that each was not severable from the other" (emphasis added). CARB has asserted the deliberative exemption as to even routine summaries of staff hours (PYs), outside contracts, and budget information. CARB is withholding 100% of the supporting documentation on the staff hours (PYs) and large numbers of documents on contracts, budget items, actual expenditures, etc., totaling over 80% of the claimed direct fee, and approximately 48,728 pages or 84% of its total file. This is detailed in (1) a comment letter from Tony Francois of KP Public Affairs providing additional comments on behalf of the Association ("Francois Letter"), and (2) a Report from Stonebridge Associates analyzing the supporting documentation on the Proposed AB 32 fee.

In particular, CARB has withheld all supporting documentation on the claimed staff hours and person years (PYs) for the following amounts (totaling \$27.8 Million of the \$54.6 Million claimed by CARB for FY 2007-2008 and 2008-2009):

<b>AB 32-Related Costs FY 2007-2008</b>		
<b>Table 3a Cost Category</b>	<b>Staff Report Numbers</b>	<b>Unsupported Amount</b>
Staff PYs	125.44	
Direct Staff Costs	\$10,611,546	\$10,611,546
Staff Overhead	\$3,724,635	\$3,724,635

<b>AB 32-Related Costs FY 2008-2009</b>		
<b>Table 3a Cost Category</b>	<b>Staff Report Numbers</b>	<b>Unsupported Amount</b>
Staff PYs	181.23	
Direct Staff Costs	\$16,086,806	\$10,193,676
Staff Overhead	\$5,636,817	\$3,301,864

We estimate that approximately \$27.8 Million is claimed by CARB for staff hours and staff overhead (PYs) for fiscal years 2007-2008 and 2008-2009, of the \$54.6 Million being retroactively claimed for those years. It is to be emphasized that the Legislature made the policy determination on greenhouse gases in 2006 and a decision to assess a fee was made by CARB in 2008. At this point CARB is primarily calculating total staff time, overhead, and other costs for its fee calculation. CARB is subject to the burden of showing that these are direct costs attributable to the AB 32 program and that the totals submitted are correct.

CARB has admitted (Declaration of Daniel Whitney in the Public Records Act litigation, p. 7:23-28) that CARB staff did *not* keep records ["ARB did *not* keep hourly records of AB 32 implementation in administration work for fiscal years 2007-2008 or 2008-2009. Accordingly the time spent on such work by CARB employees was *estimated* by CARB division chiefs for the Initial Statement of Reasons prepared for the [AB 32] Regulation" (emphasis added)]. E-mails from Edie Chang dated April 30 and May 1, 2009, to approximately 28 CARB employees, requested

estimates of staff hours and provided forms of "spreadsheets-one for fiscal year 2007/2008 and one for fiscal year 2008/2009" to be filled in with percentages of staff time allocable to claimant programs and the programs on which they work. The spreadsheets included "drop-down menus" and included instructions on certain specific programs. At least 100 pages of spreadsheets and reports were issued in response to this request, but CARB *refuses to disclose* any of these supporting documents to the Associations or the public. Nor has CARB disclosed the methodology for the estimates, or provided any means by which the estimates can be verified, reviewed for accuracy, or even identified or traced to the persons who prepared the material.

It seems to be CARB's position that the public is not entitled to see how staff calculated past-year costs, but only the final total. This position is contrary to the Legislative intent of the AB 32, the statutory requirement to which the proposed AB 32 fee regulation is subject, and the Public Records Act.

The timing of the request on staff hours also bears scrutiny. On April 30, 2009 and May 1, 2009, when Edie Chang *requested* division chiefs to produce estimates of staff hours since no hourly records existed according to Mr. Whitney, CARB staff had been issuing figures for several months. Edie Chang's request was *issued* approximately one week before the final ISOR was issued to the public. It is not clear how there could have been adequate time for accurate estimates to have been prepared and incorporated into the ISOR in such a short period of time.

CARB admits that the withheld material contains facts, financial information, numbers, and estimates, yet continues to assert that the factual data and information is privileged. The withholding of this information has resulted in significant 'data gaps' of over 80% of the fee proposed by CARB, and is prejudicing the Associations'

ability to “check the math”. CARB’s refusal to disclose documents related to direct costs severely frustrates Petitioners’ right to know how costs are being allocated and the actual costs for regulatory activities performed by CARB, and has prejudiced their ability to provide meaningful public comment on the proposed fee regulation.

**Relevant Provisions of the Administrative Procedure Act**

The requested documents at issue in this case relate to CARB’s proposed AB 32 fee regulation of \$54.6 Million in the first year and \$36.2 Million in the second year, with continuing amounts in subsequent years.

Under Govt. Code § 11346(a), there are “basic minimum procedural requirements” applicable to this proposed regulation. Under Govt. Code § 11346.5(b), CARB “shall make available to the public upon request the...reports, documentation, and other materials, related to the proposed action”.

Under Govt. Code § 11347.3(a) and (b), CARB:

**shall maintain a file...available to the public...[which] shall include:**

(7) **All data and other factual information**, technical, theoretical, and empirical studies or reports, if any, on which the agency is relying...

...

(11) Any other information, statement, report, or data that the agency is required by law to consider...

...

(12) An index or table of contents that identifies each item contained in the rulemaking file...

...

(d) The rulemaking file shall be made available by the agency to the public, and to the courts... (emphasis added)

The Associations have not received all data, financial information, reports, documentation, etc., nor or an index. CARB is withholding, e.g., the reports and documentation estimating staff time, as well as documents relating to the proposed fee, all as specified in the Francois Letter. Under the APA, CARB is required to disclose the facts, financial information, numbers, estimates, and nexus information sought under the Associations' PRA Requests, and has not yet done so.

**AB 32 Specifically Requires CARB to Implement a  
Specific Fee Accountability Program that Requires  
Disclosure of Detailed Descriptions and Financial Information**

At the time AB 32 was enacted, the Speaker of the Assembly placed the following statement in the Administrative Record: "It is my intent that and funds provided by Health and Safety Code Section 38597 are to be used *solely for the direct costs in administering* this division" (emphasis added). Govt. Code § 38597 sets forth a procedure for CARB to adopt "a schedule of fees to be paid by the sources of greenhouse admissions...*consistent* with [H&S] Section 57001..." (emphasis added). Sections 57001(b) and (c), as incorporated through § 38597, require a "fee accountability program" of CARB "designed to encourage more **efficient and cost-effective operation** of the programs for which the fees are assessed" and provide that "the amount of each fee is not more than is **reasonably necessary to fund the efficient operation** of the activities or programs for which the fee is assessed". H&S Code § 57001(a) (emphasis added); H&S Code § 38597. The requirements include "the manner in which the fee is assessed", the "management and workload standards of the program", and inclusion of elements of H&S Code § 25206.1. Section 25206.1 defines "direct costs" as the cost of processing and services "that can be specifically attributed to a particular cost objective". CARB is required ["shall comply"] with H&S Code § 25206.2(a) and (b) and provide an estimate that includes a detailed description of the work, estimated billing rates for all classes of employees working

on the project, all expected charges to be billed, billing rate and indirect cost rate schedules by employee job classification, standardized work task descriptions, and inclusion of sufficient detail so that the requestor can relate the items to the benefits received. CARB is to provide “access to time records and other materials” and there is to be a review “for accuracy and appropriateness by a member of the department staff who has direct knowledge of the work or service performed”. The inclusion of the fee accountability provision into AB 32 demonstrates the Legislature’s intent that the collection of fees under AB 32 be subject to a heightened standard of public accountability and transparency.

CARB’s withholding of the estimates, spreadsheets, and documentation on the staff time (PY) and data gaps is in conflict with these statutory obligations.

**The AB 32 Fee Regulation was Enacted by the Legislature as a Fee, which Constitutionally Requires that a Fee not Exceed the Reasonable Cost for Providing the Regulatory Activity for which this Fee is Charged**

While a tax requires approval of a two-thirds vote of the Legislature, California Constitution XIII A, Section 4, requires that fees be for a “specific purpose rather than for general governmental purposes”. *Sinclair Paint Company v. State Board of Equalization* (1997) 15 Cal.4th 866, 873. California Constitution Article XIII A, Section 4 provides authorization for a “fee which does not exceed the reasonable cost for providing the service or regulatory activity for which the fee is charged. In order to support a regulatory fee, the government bears the burden of demonstrating “(1) the estimated cost of the service or regulatory activity; and (2) the basis for determining the manner in which costs are apportioned.” 15 Cal. 4th at 878. AB 32 was not enacted as general purpose legislation by a two-thirds vote of the Legislature, and is restricted to analysis as a *fee*-based program. *Sinclair*, 15 Cal.4th at 869. Among other requirements, the amount of the fee is not to exceed “the reasonable cost of

providing” the services for which the fees are charged. *Sinclair*, 15 Cal.4th at 881. The fact that CARB is required to demonstrate this direct cost-basis under *Sinclair* only increases the public interest in disclosure of these records.

CARB’s refusal to provide the information required by the APA, by AB 32, and by *Sinclair* with respect to the calculation of the fee is preventing the Associations from reviewing whether the charges are limited to direct costs and are reasonable.

**CARB is in Breach of its Representation that it  
Would Produce the Supporting Documentation**

CARB’s correspondence represented the following:

**Letter of CARB Dated March 9, 2009:**

...ARB staff will continue to *make all responsive materials*, not exempt from disclosure under the PRA, *available to you as we complete our collection* and review of materials.

**Letter of CARB Dated March 27, 2009:**

...we endeavor to be as complete as possible and are gathering *every document that might arguably fall* within the scope of your request. Since staff is currently writing the ISOR and *is in the process of generating the very type of information covered by your request*... Once the ISOR [disclosed on May 8, 2009] is completed, the rationale and *supporting documentation will be released* to the public. (emphasis added)

CARB staff has yet to comply with its statement that “supporting documentation will be released” after May 8, 2009.

**CARB is Required to Reveal All Factual  
Support Under the Court Order Filed September 18, 2009**

A hearing was held in the Public Records Act litigation pending in Sacramento County Superior Court on September 18, 2009. CARB’s counsel made the following statements on the record:

Mr. Goldman (counsel for CARB):

Any question that Mr. Francois has in his declaration, he can ask the staff of ARB during this pending rule making proceeding just beginning, and as a matter of law under the Government Code, as this Court's tentative cites, the staff have to respond. And if they don't, they do so at their peril, as this Court recognizes because then the regulations, if adopted, without the proper substantive responses to public comments is going to be right back in this court.

And so as a matter of the law, there's a clear remedy for any confusion that the petitioners may be under. ... as a matter law, the ARB staff has to respond substantively and help [Mr. Francois, representing the Associations] understand what's going on...

And not only that, in the context of this proceeding, this Court recognizes that there's a pending separate independent APA rule making process, which as a matter of law under other provisions of the Government Code, require staff to respond to any and all public comments.

So as a matter of law in the context of this case and in light of the freestanding PRA and the freestanding APA that any and all confusion under which Mr. Francois is laboring must as a matter of law be rectified by ARB staff, and if they don't do so at their peril.

(Transcript of hearing, P 24:12-26:5)

The Courts Minute Order filed September 18, 2009 includes the following rulings:

...Respondent Board is thus already under a legal obligation to make public, through the rule-making proceeding itself, **all of the facts** that support its action.

...Viewing this matter in its proper context in relation to a pending rule-making proceeding, in which **respondent Board is already under the legal obligation to reveal the factual support for its proposed action** ... the Court finds that an in camera review of the withheld records, or any portion thereof, is not necessary to the resolution of the issues before the Court. (Order, pp. 5 and 7, emphasis added.)

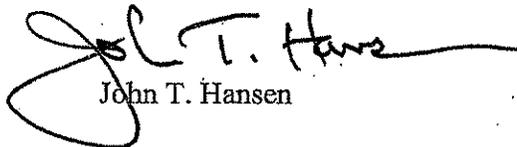
Clerk of the Board  
September 23, 2009  
Page 10

CARB is collaterally estopped from withholding all factual support for the proposed fee calculation.

Conclusion

The Associations urge the Board to uphold its responsibility to make publicly available all factual materials and documentation that support and substantiate the proposed AB 32 Fee Regulation. The Associations request the Board to adopt a resolution directing staff to produce all documents that contain spreadsheets, information on staff hours (PYs), and facts, financial information, numbers, and estimates related to the proposed fee regulation, and the nexus between the proposed action and regulated activity. The public and the Board members should be provided this information before the comment period on the proposed AB 32 Fee Regulation is closed and this matter is considered and voted on by the Board.

Very truly yours,



John T. Hansen

cc: Erika Frank, General Counsel, California Chamber of Commerce  
Michele Pielsticker, Vice President and General Counsel, California  
Taxpayers' Association  
Tony Francois, KP Public Affairs  
California Business Properties Association  
California Independent Oil Marketers Association  
California League of Food Processors  
California Manufacturers & Technology Association  
California Small Business Alliance  
Howard Jarvis Taxpayers Association  
National Federation of Independent Business – California  
The California Black Chamber of Commerce  
Western States Petroleum Association



**PUBLIC  
AFFAIRS**

September 22, 2009

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Title 17. California Air Resources Board

Agenda Item No. 09-6-5: Notice of Public Hearing to Consider Adoption of a Proposed AB 32 Cost of Implementation Fee Regulation and Proposed Amendment to the Existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

Date: September 25, 2009  
Time: 8:30 a.m.

Dear Clerk of the Board:

On behalf of the trade associations ("Associations") listed below, we respectfully submit the following comments on the California Air Resources Board's ("CARB") Proposed AB 32 Cost of Implementation Fee Regulation ("proposed AB 32 Fee Regulation"). The Associations are:

California Business Properties Association  
California Chamber of Commerce  
California Independent Oil Marketers Association  
California League of Food Processors  
California Manufacturers & Technology Association  
California Small Business Alliance  
California Taxpayers' Association  
Howard Jarvis Taxpayers Association  
National Federation of Independent Business-California  
The California Black Chamber of Commerce  
Western States Petroleum Association

**I. INTRODUCTION**

As the Associations have made clear in their previous comments to the Board regarding the proposed AB 32 Fee Regulation, they are committed to ensuring that public agencies adopt regulations, such as the proposed AB 32 Fee Regulation, in a fair, open, and transparent process. This is especially important where, as here, the subject Regulation will have a wide-ranging and

dramatic impact on the California economy. The Legislature has made clear that any fees collected pursuant to Health & Safety Code § 38597—the source of CARB’s authority here—must be assessed “on sources of greenhouse gas emissions” and “solely for the direct costs incurred” for administration of AB 32. *See* Health & Safety Code § 38597; *see also* letter from Fabian Nunez to the Assembly Daily Journal, August 31, 2006 (appended hereto as Attachment A).

As discussed below, CARB staff has failed—in the public records that it has thus far provided to the Associations, in the records that it has made public on the CARB website, and in the materials it has presented in its public workshops—to establish that the fee compelled by the proposed AB 32 Fee Regulation will actually be collected “solely for the direct costs incurred” for AB 32 administration. CARB staff has also failed, in the public records provided thus far, to establish that the CARB will impose the proposed fees only on “sources of greenhouse gas emissions”—with respect to various sources of greenhouse emissions regulated by CARB under AB 32 but which are not charged fees under the proposed AB 32 Fee Regulation. Finally, CARB is required to develop a fee regulation based upon a proper nexus between the fees collected, the fee payers, and the regulatory activity funded by the fee, and to fairly allocate the fee among fee payers. CARB has failed, in the public records provided thus far, to establish a proper nexus and a fair allocation of the proposed fees. The refusal by CARB staff to make public supporting documentation related to the proposed AB 32 Fee Regulation has seriously impaired the Associations’ ability to provide informed comments on the proposed AB 32 Fee Regulation.

The Associations have done their best to analyze the records and materials made available to the public and to submit comments based upon this analysis. These comments were previously set forth in the June 24 comment letter to you on behalf of the Associations.

One of the principal things the Associations have learned, as a result of analysis of public records as well as recent litigation over records that CARB has insisted on keeping secret, is that there does not appear to be any simple, straightforward way to query CARB’s financial records to determine CARB’s actual expenses related to AB 32 implementation over the two most recently completed fiscal years. Instead, the only way that the CARB staff has been able to provide any information on this subject is to engage in what amounts to a wide ranging internal debate, the outcome of which seems to depend on judgment calls (not accounting practices) and the contents of which are meant to be kept secret from the public. This is not an auspicious beginning to what should be a fairly straightforward process of calculating CARB’s AB 32 administrative costs and allocating those costs fairly across the various regulated sources of greenhouse gas emissions.

## **II. APA REQUIREMENTS AND CARB’S CONSIDERATION OF THE PROPOSED AB 32 FEE REGULATION**

Under the California Administrative Procedure Act (“APA”)(Government Code, section 11340 et seq.) there are “basic minimum procedural requirements” applicable to adoption of regulations. *See* Govt. Code § 11346(a). Among the requirements are the maintenance of an

administrative file of the rulemaking that is available to the public, which includes: “all data and other factual information, technical, theoretical, and empirical studies or reports, if any, on which the agency is relying,” “any other information, statement, report, or data that the agency is required by law to consider,” and “an index or table of contents that identifies each item contained in the rulemaking file.” Govt. Code § 11347.3(a)-(b). The APA also requires agencies to “make available to the public upon request... reports, documentation, and other materials, related to the proposed action.” § 11346.5(b).

To date, CARB staff has failed to comply with the requirements of the APA. The Associations have not received all data, financial information, reports, or documentation relating to the proposed AB 32 Fee regulation, despite repeated requests for such information, and attempts to gain access to these records through California Public Records Act (“CPRA”) requests and litigation. CARB staff is withholding, by its own admission, documents containing factual data related to staff hours, equipment costs, and contract costs relied upon by CARB staff in drafting the regulation. The withholding of these types of records from the public is in direct conflict with the APA requirements cited above.

Actions by CARB staff also raise the possibility that the Office of Administrative Law (“OAL”) will disapprove the proposed AB 32 Fee Regulation, due to the lack of support in the administrative record. The OAL reviews agency regulations to verify whether an agency’s rulemaking is legally valid, supported by an adequate record, and easy to understand. This means that OAL will disapprove the proposed AB 32 Fee Regulation if it finds that CARB has violated aspects of the APA (by maintaining an incomplete rulemaking file), or has otherwise failed to satisfy the “Necessity,” “Clarity,” “Consistency,” “Reference,” and “Nonduplication” standards required under Govt. Code § 11349.1.

### III. THE ASSOCIATIONS’ PUBLIC RECORDS ACT REQUESTS

On February 13, 2009, the Associations submitted a CPRA request to CARB, seeking 16 categories of documents that would substantiate the basis for, and the amount of, the fees to be collected under the proposed AB 32 Fee Regulation, as well as substantiate the nexus between the fees to be paid, the fee payers, and the regulatory activity to be funded with the fees. Initially, CARB staff failed to comply with the February 13 CPRA request, and raised objections based on asserted deliberative process, attorney-client, and attorney work product privileges. Eventually, in response to the February 13, 2009 CPRA request, between March 9, 2009 and April 30, 2009—after prodding from the Associations and in four separate productions—CARB staff provided 3,227 pages, *but withheld 11,981 pages of CARB’s records*. Upon review, the Associations concluded that the released records fell well short of substantiating the basis for the amount of fees CARB plans to collect through the proposed AB 32 Fee Regulation. Almost nothing in these records provided information on CARB’s actual costs to implement AB 32 in the past or future. On May 28, 2009, the Associations submitted to CARB a second and third CPRA request, covering the period through the release of the May 8, 2009 Staff Report for the proposed AB 32 Fee Regulation (“May 8 Staff Report”) and beyond, and covering the same categories of documents as the February 13 request.

On June 19, 2009, less than a week before the originally scheduled date to adopt the proposed AB 32 Fee Regulation, CARB staff produced approximately 5,500 pages of records in its initial response to the Associations' second and third CPRA requests, covering the period from February 13, 2009, through May 28, 2009. On August 11, 2009, CARB staff released an additional 569 pages of records in response to the third CPRA request, and revealed that CARB staff had withheld 36,272 pages of records from the second and third CPRA requests. CARB has to date only released 9,463 pages of records in response to the Associations' CPRA requests, *and has withheld a total of 48,728 pages of records*. The vast majority of records released to the Associations by CARB were inconsequential materials not directly related to the calculation of past year costs of AB 32 implementation or to the nexus between the proposed AB 32 Fee Regulation and AB 32 program activities.

Because CARB staff has withheld the majority of the administrative file relating to the proposed AB 32 Fee Regulation, the Associations are at a distinct disadvantage in making meaningful comments on aspects of the proposed Regulation. Accordingly, the Associations are basing their comments solely on the review of those limited and incomplete public records that have been provided to them, and that provide very little insight into actual past year expenditures related to AB 32 program activities. Therefore, the Associations emphasize that their comments are not exhaustive of the deficiencies in the record relating to the proposed AB 32 Fee Regulation, but merely indicative of the types of deficiencies the Associations have identified. In reviewing the limited and incomplete records that CARB has provided them, the Associations have identified significant "data gaps" between the information that CARB has provided to them and the figures presented in the May 8 Staff Report. The "data gaps" (discussed in Section V, below) are representative of the types of discrepancies and lack of support for AB 32 expenses that the Associations have observed in the records available to them.

#### IV. THE CPRA LITIGATION IN SACRAMENTO SUPERIOR COURT

As a result of CARB staff refusing to release a large portion of responsive records to the Associations' CPRA requests, the Associations' were forced to resort to legal action to gain the release of those records. An action was filed on May 7, 2009 to obtain access to the documents withheld by CARB relating to the **basis** for the **amount** of the proposed fee and the **nexus** with the regulatory activity to be funded by the proposed fee under Health & Safety Code § 38597. The CPRA authorizes injunctive and declarative relief, and a writ of mandate, to enforce the public's right to inspect or receive a copy of public records, with an expedited procedure for the court to issue a decision "at the earliest possible time."

The Associations sought an alternate writ of mandate requiring CARB to show cause why the 48,728 pages of materials withheld from the disclosures pursuant to the February 13 and May 28 CPRA requests were not subject to disclosure. The Superior Court issued the alternative writ on July 17, 2009, and set a hearing for in camera review of the records on September 18, 2009. Through the meet-and-confer process, the Associations agreed to eliminate certain categories of requests and to eliminate duplicative materials from their requests, and yet CARB still withheld over 48,000 pages of documents that are responsive to the Associations' requests.

Throughout the meet-and-confer process, the position of CARB staff never shifted from its insistence on withholding records that it admits contain "internal ARB cost estimates and related analysis of numbers." CARB's Brief in Support of Opposition to Disclosure of Privileged Documents at 11, *California Business Property Association, et al., v. California Air Resources Board*, No. 34-2009-80000232, Sacramento Superior Court, Aug. 26, 2009.

At the September 18 hearing, the court ruled that CARB was not required to release the records it was withholding, despite the existence of "data gaps" related to the proposed AB 32 Fee regulation. The court stated that it was significant that the materials at issue related to a rulemaking process, where CARB was "already required by law to prepare [a] Statement of Reasons and an administrative record in support of the proposed (and final) regulation that contains the factual information on which the regulation is based." Minute Order, *California Business Property Association, et al., v. California Air Resources Board*, No. 34-2009-80000232, Sacramento Superior Court, Sept. 18, 2009. The court went on to state that "respondent Board is already under the legal obligation to reveal the factual support for its proposed action," and that "any failure by the Board to provide facts in the rule-making record to support its action presumably would make the regulation vulnerable to legal challenge." *Id.* At the September 18 hearing, Matthew Goldman, attorney for CARB, represented to the Associations, and assured the court, that any questions that the Associations have relating to substantiation of the actual costs of AB 32 implementation, or any other issues, would be answered by CARB staff in the rulemaking process.

Based on the ruling of the September 18, 2009 hearing, and the commitments of CARB's attorney Matthew Goldman at that hearing, it is the Board's legal duty to assure that the rulemaking record contains all the supporting factual documentation, data, and information relating to the proposed AB 32 Fee Regulation, and that CARB staff make public the financial and factual information used by CARB staff to determine the purported "actual costs" of AB 32 implementation they present in the May 8 Staff Report. Following the public release of such information, the Board should continue the 45-day comment period, as requested in Section VI below, in order to allow informed comments from the public.

## V. THE ASSOCIATIONS' COMMENTS

As discussed above, CARB has a legal duty to make available to the public, through the rulemaking file, all "data and other factual information, technical, theoretical, and empirical studies or reports, if any, on which the agency is relying" in adopting a regulation. Govt. Code § 11346(a). Additionally, a regulation must be legally valid, and the rulemaking record must be supported by adequate evidence. *See* Govt. Code § 11349.1. The Associations' have closely scrutinized all records released by CARB staff in response to the CPRA requests. In addition, the Associations have reviewed all records made public by CARB staff at public workshops for the proposed AB 32 Fee regulation, and all records posted to CARB's website relating to the proposed AB 32 Fee Regulation. The Associations can not identify the supporting documentation for the past year, current year, or future year expenditures for AB 32 implementation on which CARB staff is basing the proposed AB 32 Fee Regulation. This

indicates that there is not an adequate record documenting the actual "direct costs" of AB 32 implementation to support the proposed AB 32 Fee Regulation, and that adoption of the proposed regulation would violate both the express legislative intent of AB 32 and the provisions of the APA.

The Associations strongly urge the Board not to adopt the proposed AB 32 Fee Regulation at this time, or until the past year and current year accounting for the actual costs of AB 32 implementation is made public, and CARB staff provides documentation for all expenditures from fiscal years 2007-08 and 2008-09, and for all anticipated 2009-10 expenditures, related to AB 32 implementation in reasonable detail. Based on the records released by CARB in response to the Associations' CPRA requests, CARB has failed to substantiate the cost-basis for claimed expenditures from fiscal years 2007-2008 and 2009-2008. It would be an abuse of the Board's discretion to proceed with adoption of the proposed fee regulation when the actual costs of implementation of AB 32 are not publicly accounted for, and when they seem based only on secret internal agency debates.

The Associations submitted their CPRA requests on CARB in an attempt to obtain the documentation for the costs of AB 32 implementation that CARB staff claims for fiscal years 2007-08 and 2008-09. These costs from past years will be collected from regulated parties retroactively over a period of four years, according to the May 8 Staff Report. *See* May 2009 Staff Report, at p. 106-107. CARB staff has presented summaries of the estimated expenses for these past years on pages 109-11 of the May 8 Staff Report in Table 3a, titled "AB 32 Position Information and Program Costs for Program Summary, FY 2007-08" (updated 6/11/09 on the CARB website), and Table 4a, titled "AB 32 Position Information and Program Costs for Program Summary, FY 2008-09" (updated 5/27/09 on the CARB website). These tables purport to show the estimated expenses for implementation of AB 32 in fiscal year 2007-08 and fiscal year 2008-09. However, CARB staff has failed to release records to the Associations that will substantiate these estimated expenses. CARB staff's disclosures have not explained the many discrepancies between the information presented in the May 8 Staff Report and the records provided in response to the Associations' CPRA requests. The withholding of supporting documentation for the AB 32 implementation has resulted in considerable "data gaps" between the total amounts that CARB staff is claiming serve as the cost-basis for the fee, and what can be ascertained from records CARB staff has made public. The refusal of CARB staff to release records that substantiate past year expenditures and directly address the "data gaps" has severely prejudiced the Associations' ability to make meaningful comments and participate in the public comment period.

Further, the records CARB staff has released related to direct staff expenses raise serious questions about CARB staff's accounting practices. The questionable accounting for past year expenses related to AB 32, in addition to the lack of substantiation of actual expenditures for fiscal years 2007-08 and 2008-09, calls into question the basis for any estimated future year budgets for AB 32 administration. This means that the very basis for fee collection under the proposed AB 32 Fee Regulation, the Total Required Revenue ("TRR"), is deeply flawed. Such a critical flaw in the calculation of the AB 32 fee formula calls into question whether the

methodology for collection of fees in the proposed AB 32 Fee Regulation is supported by substantial evidence.

In addition, CARB staff posted spreadsheets to the CARB website on June 1, 2009 that report an allocation of direct staff expenditures among various AB 32 program elements and specific AB 32 regulations. Copies of these staffing resources spreadsheets are posted at <http://www.arb.ca.gov/cc/adminfee/spreadsheets.htm>. These spreadsheets indicate that a significant percentage of CARB's direct staff expenses for implementation of AB 32 are not related to regulation of the four fuels and two process emission categories on which the proposed AB 32 fee would be imposed. The inclusion of these activities raises questions as to whether CARB staff has established a sufficient nexus between the regulated activities and the proposed AB 32 fee, if these types of activities are included as costs to be recovered under the proposed AB 32 Fee Regulation.

According to the May 8 Staff Report, all expenses the fee will recapture for past and future years will be based on Budget Change Proposals ("BCPs") submitted to the Department of Finance by CARB and other agencies that are eligible for reimbursement through the proposed AB 32 fee. In responding to the Associations' CPRA requests, CARB staff has provided many copies of BCPs for CARB and the other agencies that the proposed fee will reimburse or fund (including Cal/EPA, California Energy Commission, Integrated Waste Management Board, Department of Food and Agriculture, and General Services). State agencies use BCPs to request additional funding for staffing and other funding changes each year. They do not reflect actual expenditures by state agencies, and do not in fact reflect the actual level of funding received by agencies from the state each year. Therefore, basing the level of funding each agency may be entitled to on BCPs is an inaccurate and improper method of cost recovery.

The response from CARB staff to the Associations' CPRA requests and the method for internal collection of cost-related information for the proposed AB 32 Fee Regulation calls into question CARB staff's approach to calculating the actual costs of AB 32 implementation related to the proposed AB 32 Fee Regulation. Mr. John Rozsa of Stonebridge Associates, Inc., an expert on accounting practices of public agencies, has prepared a report that he has submitted to the Board analyzing records made public by CARB staff relating to costs of AB 32 implementation. See John Rozsa, Analysis of Public Records Submitted in Support of Proposed AB 32 Greenhouse Gas Regulation Fee, Sept. 22, 2009 (hereinafter, the "Rozsa Report"). According to the Rozsa Report, the only reliable means of validating all costs incurred for the implementation and administration of AB 32 is the California State Accounting and Reporting System ("CALSTARS system). "CALSTARS provides state agencies with an automated organization and program cost accounting system for systematically accounting for all revenue, expenditures, receipts, disbursements, and property of the state." Rozsa Report at p. 6. According to Mr. Rozsa, the CALSTARS system is capable of validating all CARB expenditures related to AB 32 activity over the past two fiscal years, and is the only reliable method of doing so. Why CARB staff would rely on estimates of expenses such as staff salaries, contracts, and equipment, therefore, is highly questionable.

The foot dragging and delayed response from CARB staff also calls into question the level of seriousness with which CARB staff has treated the Associations' request for public records relating to the calculation of the cost basis for the proposed fee. As previously noted, up through April 30, 2009, CARB did not release any records that would substantiate any actual costs to implement AB 32 in prior, present, or future fiscal years. On that date, after the Associations had been requesting cost data for three months, and CARB had been advising the Associations and others that its implementation costs for the prior two fiscal years had been \$57 million and the future implementation costs would range from \$36 to \$55 million, CARB's Office of Climate Change finally requested that each of CARB's division chiefs provide information to substantiate CARB's staffing resources for the preparation of a staff report that would be released five working days later ("April 30, 2009 e-mail"). A copy of the April 30, 2009 e-mail is attached as Attachment B. CARB staff claims it relied on responses from its division chiefs (and perhaps others) to the April 30, 2009 e-mail to create Tables 3a and 4a, and the staffing resources spreadsheets. However, the records released to the Associations by CARB in response to the Associations' CPRA requests do not support many of the estimated numbers appearing in Tables 3a and 4a, or the numbers in the staffing resources spreadsheets. In papers filed by CARB in the above referenced litigation, CARB staff has admitted that it is withholding responses to the April 30, 2009 email containing estimates of staff time under the deliberative process privilege. See Whitney Declaration in Support of CARB's Opposition to Disclosure of Privileged Documents at ¶ 13, *California Business Property Association, et al., v. California Air Resources Board*, No. 34-2009-80000232 (Sacramento Superior Court, Aug. 26, 2009).

CARB staff's insistence on withholding all records that "reflect the development of estimated ARB costs (e.g., staff resources, vendor contracts)" has resulted in a situation where the public has no access to information that would document or support the actual costs of AB 32 implementation. Further, the last minute scramble on April 30, 2009, just prior to release of the May 8 Staff Report, to gather estimates for staff time and other costs related to AB 32 implementation suggests that CARB staff may have failed to approach the calculation of past year costs with the level of efficiency and accountability required under California law.

#### **Data Gaps in CARB's Estimated Expenditures Related to AB 32 for Fiscal Years 2007-08 and 2008-09**

As a direct consequence of CARB staff's withholding of supporting documentation for past year costs, there remain significant "data gaps" between the costs claimed by CARB staff in Tables 3a and Table 4a of the May 8 Staff Report and the actual expenditures by CARB that can be calculated from records either previously made public or released to the Associations through their CPRA requests. For example, Table 3a of the May 8 Staff Report includes an estimated subtotal of 125.44 PYs (person years), purportedly covering CARB staff working on AB 32 programs for FY 2007-08, and Table 4a includes an estimated subtotal of 181.23 PYs, purportedly covering CARB staff working on AB 32 programs for FY 2008-09. As stated above, on April 30, 2009, CARB staff requested each of its divisions to provide spreadsheet information for each employee and percentage of time working on specific AB 32 programs. However, charts and spreadsheets provided to the Associations with reported PYs and percentages of time spent on AB 32 programs from individual divisions account for only 57.44 PYs in fiscal year 2007-08, and only 65.32 PYs in fiscal year 2008-09. Copies of the CARB

records containing these PY estimates are attached as Attachment C. Even the estimated numbers of PYs from these records are not validation that these PYs were actually involved in AB 32-related activities, as some of these records do not identify a division, and some do not identify the author of the document. This “data gap”—related to the estimated number of staff working on AB 32 programs, and the specific work done in implementing AB 32—and all other “data gaps” related to the actual cost of AB 32 implementation, seriously impacts the implementation of CARB’s Fee Accountability Program, and the ongoing calculation of the TRR, as described in the Fee Calculation Methodology section of the May 8 Staff Report. *See* May 8 Staff Report at p. 21.

CARB has also failed to release records that would substantiate salary expenses for CARB staff working on AB 32 implementation activities from fiscal years 2007-08 and 2008-09. Table 3a and Table 4a of the May 8 Staff Report include expense categories for “Actual Annual Salaries,” which list CARB staff salaries by job classification. Table 3a includes a subtotal of \$10,611,546 for “Actual Annual Salaries” for fiscal year 2007-08, while Table 4a includes a subtotal of \$16,086,806 for “Actual Annual Salaries” for fiscal year 2008-09. CARB has not released records in response to the Associations’ CPRA requests that support the calculation of these subtotals for “Actual Annual Salaries” for fiscal years 2007-08 or 2008-09, because CARB has not released records that show how staff time was estimated by separate divisions, how salaries were assigned to AB 32-related categories, or other evidence of “Actual Annual Salaries” totals for fiscal years 2007-08 or 2008-09. CARB staff has released a CALSTARS report that contains evidence of expenditures for certain divisions for the first seven months of fiscal year 2008-09, including expenditures for personnel salaries. A copy of the CALSTARS Report is attached as Attachment D. However, the CALSTARS report fails to indicate whether any salary costs are related to AB 32 implementation. As the Rozsa report confirms, CARB staff has not released or made public any records that validate CARB’s total claimed costs of \$ 26,698,352 in “Actual Annual Salary” related to AB 32 implementation for fiscal years 2007-08 and 2008-09. *See* Rozsa Report at p. 12-13.

CARB staff “Benefits” is an expense category on Table 3a and Table 4a that is related to the cost category of “Actual Annual Salaries.” According to the May 8 Staff Report, CARB staff calculated total “Benefits” by multiplying the total “Annual Actual Salary” by 35.04%. The “Benefits” category in Table 3a of the May 8 Staff Report includes a subtotal of \$3,724,653 for fiscal year 2007-08, while the “Benefits” category in Table 4a of the May 8 Staff Report includes a subtotal of \$5,366,817 for fiscal year 2008-09. Because CARB staff has failed to substantiate the total expenses for “Annual Actual Salary” related to AB 32 implementation for fiscal years 2007-08 and 2008-09, the total expenses for CARB staff “Benefits” are also not substantiated. Accordingly, CARB has not made public any records or information that can validate the total claimed expenditures of \$9,091,470 for “Benefits” related to AB 32 implementation for fiscal years 2007-08 and 2008-09. The Rozsa Report confirms the Associations’ findings that there is no support for “Benefits” costs included in the proposed AB 32 Fee Regulation. *See* Rozsa Report at p. 12-13.

Another area of significant “data gaps” is CARB staff’s accounting for past fiscal year expenses related to the categories of “Operating Costs” included in Tables 3a and 4a of the May 8 Staff Report. According to Tables 3a and 4a, CARB expended \$4,161,096 in “Operating

Expenses" related to AB 32 implementation for fiscal year 2007-08, and \$7,474,650 in "Operating Expenses" related to AB 32 implementation for fiscal year 2008-09. CARB staff has divided "Operating Costs" into several sub-categories, including "General Expense," "Printing," "Communications," "Postage," "Training," "Travel-In-State," and "Facilities." Records released by CARB in response to the Associations' CPRA requests contain no substantiation of costs in any sub-category of "Operating Costs" for fiscal years 2007-08 and 2008-09. The CALSTARS report, discussed above, does not substantiate any of these expense categories, as there is no indication in the CALSTARS report that these expenses relate to AB 32 implementation. The Rozsa Report notes that these costs are dependent on the numbers of PYs used to calculate the expense, as CARB staff has determined a "Standard Average per Position Cost" for all Operating Costs. See Rozsa Report at p. 10. The Rozsa Report also questions the "especially troublesome General Expense rate of \$20,454 per person" claimed for fiscal year 2008-09, given that the category does not even include expenses for facilities or administrative overhead. *Id.* at 10. The Rozsa Report concludes that these costs are not validated by any records made public by CARB, and that the total claimed expenditures of \$11,635,746 for "Operating Costs" related to AB 32 implementation for fiscal years 2007-08 and 2008-09 are not substantiated by any evidence. *Id.* at p. 9.

The final category of expenses listed in Table 3a and Table 4a of the May 8 Staff Report is "Other Costs," which includes the sub-categories "Contracts," "Equipment," and "Administrative Overhead." Table 3a includes a subtotal of \$4,652,429 for "Contracts" related to AB 32 implementation for fiscal year 2007-08, and Table 4a includes a subtotal of \$5,900,000 for "Contracts" related to AB 32 implementation for fiscal 2008-09. CARB has not released any records that substantiate the actual expenses related to Contracts for fiscal years 2007-08 and 2008-09. While the CALSTARS report released by CARB to the Associations does contain some evidence of Contract expenditures, for the reasons discussed above, the CALSTARS report does not substantiate that any of these expenses relate to AB 32 implementation. Other records released by CARB which relate to AB 32 contracts consist mainly of spreadsheets that list various contracts, the subject of the contract, and the amount of the contract. These records do not make clear which contract amounts are included in the amounts reported in Tables 3a and 4a of the May 8 Staff Report, and provide no information as to amounts actually disbursed by fiscal year. As the Rozsa Report found, "no two of these lists arrive at the same contracts total, nor does a single one of them show the total listed on [Table] 3a." See Rozsa Report at p. 9. In addition, CARB staff provided no records to the Associations that substantiate that these contracts were actually filled, as no receipts or other documentation confirming contract expenses were included in CARB releases of records. The contracts themselves were not produced. CARB has not produced any records that validate the total claimed expenditures of \$10,552,429 for "Contracts" related to AB 32 implementation for fiscal years 2007-08 and 2008-09.

Another sub-category of "Other Costs" listed in Tables 3a and 4a of the May 8 Staff Report is "Equipment" expenses related to AB 32 implementation. Table 3a includes a subtotal of \$45,180 in "Equipment" expenses for fiscal year 2007-08, and Table 4a includes a subtotal of \$1,830,564 in "Equipment" expenses for fiscal year 2008-09. However, CARB has not released any record to the Associations containing support for equipment expenses in fiscal years 2007-08

and 2008-09. While the CALSTARS report released by CARB to the Associations does contain some evidence of equipment expenditures, for the reasons discussed above, the CALSTARS report does not substantiate that any of these expenses relate to AB 32 implementation. The Rozsa Report confirms the Association's findings, by stating that there is no validation for CARB's total claimed expenditures of \$1,875,744 for "Equipment" related to AB 32 implementation for fiscal years 2007-08 and 2008-09. *See* Rozsa Report at p. 10-11.

Another area of costs where CARB staff has not released any information to the Associations that substantiates the agency's claimed expenses is "Administrative Overhead." According to the May 8 Staff Report, these expenses include executive oversight, as well as administrative and computer support for AB 32 programs. *See* May 8 Staff Report at p. 107. CARB calculated this amount by attributing 13% of all agency "Administrative Overhead" costs to AB 32-related activities. *See* May 8 Staff Report at 107. Table 3a includes a subtotal of \$1,998,872 in "Administrative Costs" for fiscal year 2007-08, and Table 4a includes a subtotal of \$1,961,069 in "Administrative Costs" for fiscal year 2008-09. CARB staff has not provided the Associations with any records supporting a determination that 13-percent of all CARB activities are climate change-related, nor has CARB staff released any records that support attributing 13-percent of administrative services to climate change based on such a conclusion. This proposed approach of attributing costs to AB 32 implementation is objectionable based on the lack of any substantial evidence that any of these administrative activities relate to AB 32 activities. In addition, the Rozsa Report raises that possibility that "the Administrative Overhead has been inflated through double counting." *See* Rozsa Report at p. 10. In total, CARB staff has failed to substantiate the total claimed expenditures \$3,959,941 in "Administrative Costs" related to AB 32 implementation for fiscal years 2007-08 and 2008-09.

As detailed above, the information that CARB has released to the Associations does not explain how they calculated the total cost-basis for AB 32-related work in fiscal years 2007-08 and 2008-09, which has resulted in significant "data gaps" in the records released to date. For past fiscal years 2007-08 and 2008-09, CARB has estimated that its costs totaled \$64,083,681. However, CARB has failed to substantiate any of its past year expenditures related to AB 32 implementation in the records released in response to the Associations' CPRA requests, in records released by CARB at public workshops, and in records and information made public on CARB's website. Based on the Associations' review of all these records and information, there is a complete lack of support for past year expenditures, and also a lack of substantial evidence supporting the accounting of expenses relating to AB 32 implementation in fiscal year 2007-08 and 2008-09.

#### **Deficiencies in the Calculation of the Total Required Revenue for the Proposed AB 32 Fee Regulation**

The May 8 Staff Report states that the under the proposed Fee Calculation Methodology, "each year ARB will determine the annual revenue requirement," and that the Total Required Revenue will be the sum of legislatively approved AB 32 program expenditures, in addition to the amounts required to pay back loans for AB 32 implementation from past years. CARB, May 8 Staff Report at 21. The May 8 Staff Report contains a description and definition of the term Total Required Revenue, as it relates to the proposed AB 32 Fee Regulation. *See* May 8 Staff

Report at p. 21. According to the May 8 Staff Report, the Total Required Revenue calculation is "the total amount of money that ARB will collect on an annual basis . . . the regulated public will be able to accurately compute the cost of the efforts of state agencies implementing AB 32." As described in detail in the above paragraphs, the records made public by CARB staff to date do not allow an accurate computation of the costs of the efforts of state agencies implementing AB 32. Analysis of these records reveals significant "data gaps" between the records and Tables 3a and 4a in the May 8 Staff Report, relating to expenditures for fiscal years 2007-2008 and 2008-2009.

The May 8 Staff Report also includes tables which report expected expenditures for CARB and other agencies related to implementation of AB 32 for fiscal year 2009-2010. See May 8 Staff Report at p. 126-30. Table 8 summarizes these figures, and Tables 9-14 reports the anticipated staff, contracts, and equipment costs for CARB, the California Integrated Waste Management Board, the Energy Commission, the California EPA, the Department of General Services, and the Department of Food and Agriculture respectively. Table 8 reports a total of \$36.2 million in anticipated costs for the six entities for fiscal year 2009-2010. The May 8 Staff Report also describes criteria to be used by CARB in determining which of its own expenses and which expenses of other agencies would be recovered through the proposed AB 32 fee for the current and future fiscal years. See May 8 Staff Report at p. 125.

However, the Associations review of records released by CARB in response to the CPRA requests, and of records made public by CARB, reveals no records that allow the regulated public to accurately compute the anticipated actual cost of the efforts of state agencies implementing AB 32 in fiscal year 2009-2010, which costs the proposed AB 32 fee will be recover. The only records related to this subject at all are the various Budget Change Proposals related to the six agencies indicated. The total amount of each of these proposals appears to differ from the amounts shown for each agency in Tables 9-14 of the May 8 Staff Report. There are no records, among those released by CARB in response to the Associations' CPRA requests, that provide substantial information on how CARB computed the figures appearing in Tables 9-14 of the May 8 Staff Report, or how those figures relate to those in the budget change proposals.

Other than the various budget change proposals discussed above, there are no records released by CARB in response to the Associations' CPRA requests that allow the regulated public to accurately compute the budgeted cost of the efforts of state agencies implementing AB 32 in fiscal year 2009-2010, the same costs the proposed AB 32 fee would recover. In addition, CARB has not released or made public any records that relate to the PYs, staff salaries, equipment costs, contract costs, or other costs of other state agencies that are to be reimbursed through the proposed AB 32 Fee Regulation for fiscal year 2009-10 and onward. CARB staff has also failed to release any records or information that explain how CARB determines or proposes to determine, for fiscal years 2009-2010 and onward, what the actual number will be for Total Required Revenue or that identify 'the amount approved in the California Budget Act' as the 'cost of implementing AB 32.' This amounts to a huge "data gap" that impacts directly upon the very basis for fee collection under the proposed AB 32 Fee Regulation. Because CARB staff has not released the information described above, the proposed method of determining the Total Required Revenue does not appear to be based on the "actual costs" of

implementation of AB 32. Such a critical flaw in the calculation of the AB 32 fee formula calls into question whether substantial evidence supports the methodology for collection of fees in the proposed AB 32 Fee Regulation.

**Lack of Support for Nexus between the Regulated Activities and the Proposed AB 32 Fee**

The Associations have previously commented to CARB relating to the lack of support for the nexus between the regulated activities under AB 32, and the proposed collection of fees from six sources of green house gas emissions. Our position on this issue has not changed, and CARB staff has not released any records or information that would address the issues identified in our previous letter. Attached for the Board's convenience as Attachment E is a copy of the Associations' June 24, 2009 comment letter on the proposed AB 32 Fee Regulation. Additionally, on May 26, 2009, the Associations submitted a series of comments in the form of questions to CARB's legal staff relating mainly to nexus issues and the proposed AB 32 Fee Regulation. Because CARB staff has not treated this submission as a formal comment letter, we are re-submitting the original May 26, 2009 comment letter for the CARB's formal consideration and response. A copy of the May 26, 2009 comment letter is attached as Attachment F.

\* \* \* \* \*

As stated above, a major hurdle preventing the Associations from making meaningful comments on the proposed AB 32 Fee Regulation has been the ongoing foot dragging by CARB staff and its refusal to timely provide them with public records that would support and substantiate major components of the proposed AB 32 Fee Regulation. CARB has a legal duty under the Health and Safety Code and the APA to assure the public that fees collected under the proposed AB 32 Fee Regulation will be assessed "solely for the direct costs incurred" by AB 32, and that the public shall have access to "data and other factual information, technical, theoretical, and empirical studies or reports" on which CARB relied in drafting the proposed regulation. As a result of the Court's ruling in *California Business Properties Association v. California Air Resources Board*, discussed above, CARB has a "legal obligation to reveal the factual support for its proposed action," and CARB's attorney committed the agency to answering all questions, and responding to all comments, from the Associations relating to substantiation of the actual costs for AB 32 implementation and other data gaps the Associations have identified.

In the interest of open government and full transparency, as well as CARB's legal duties in regards to adoption of the proposed Regulation, CARB staff must publicly disclose all supporting documentation for the proposed AB 32 Fee Regulation prior to any action the Board may take, and thereby allow the public to have a full and fair opportunity to comment on the proposed AB 32 Fee Regulation.

**VI. REQUEST FOR CONTINUATION OF THE 45-DAY COMMENT PERIOD**

The Associations respectfully request the Board to defer final action on adoption of the proposed AB 32 Fee Regulation until CARB staff, as required by law, have released all

Clerk of the Board  
September 22, 2009  
Page 14

supporting documentation related to (a) the actual costs of AB 32 implementation for past and current fiscal years, and (b) supporting data and information relating to the nexus between the activities to be funded and the six sources of greenhouse gas emissions on which fees will be imposed. As noted above, there are substantial questions concerning the accuracy and verification of calculations affecting all costs involved in the proposed AB 32 Fee Regulation. The Associations and the general public are unfairly prejudiced by lack of access to the withheld information, and the Board should exercise its discretion to allow additional time for the public to gain access to this information and prepare their comments accordingly.

\* \* \* \* \*

Thank you for allowing me to submit these comments. If you have any questions you can contact me at (916) 498-7722.

Very truly yours,



Tony Francois

cc: James Goldstene, ARB  
Kevin Kennedy, ARB  
Edie Chang, ARB  
Jon Constantino, ARB  
Robert Jenne, ARB  
Ellen Peter, Chief Counsel, ARB  
Cindy Tuck, Cal/EPA  
Erika Frank, General Counsel, California Chamber of Commerce  
Michele Pielsticker, Vice President and General Counsel, California  
Taxpayers' Association  
Tony Francois, KP Public Affairs  
California Business Properties Association  
California Independent Oil Marketers Association  
California League of Food Processors  
California Manufacturers & Technology Association  
California Small Business Alliance  
Howard Jarvis Taxpayers Association  
National Federation of Independent Business – California  
The California Black Chamber of Commerce  
Western States Petroleum Association

TAB A

FABIAN NUÑEZ  
SPEAKER OF THE ASSEMBLY

LETTER TO THE JOURNAL

August 31, 2006

Mr. E. Dotson Wilson  
Chief Clerk of the Assembly  
State Capitol, Room 3196  
Sacramento, CA 95814

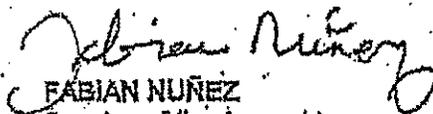
Dear Mr. Wilson:

I am submitting this letter to the Assembly Daily Journal regarding AB 32, the Global Warming Solutions Act of 2006.

AB 32 authorizes the California Air Resources Board to adopt a schedule of fees to pay for the direct costs of administering the reporting and emission reduction and compliance programs established pursuant to the bill's provisions.

It is my intent that any funds provided by Health and Safety Code Section 38597 are to be used solely for the direct costs incurred in administering this division. This intent is further demonstrated by the fact that Section 38597 is contained within Part 7 of the bill which relates to the California Air Resources Board's administrative functions.

Sincerely,

  
FABIAN NUÑEZ  
Speaker of the Assembly

**TAB**

B

**Corey, Richard@ARB**

**From:** Chang, Edie@ARB  
**Sent:** Thursday, April 30, 2009 7:18 PM  
**To:** Murchison, Linda@ARB; Fletcher, Bob@ARB; Ryden, Jim@ARB; Croes, Bart@ARB; Corey, Richard@ARB; Loscutoff, Bill@ARB; Cross, Bob@ARB; Hebert, Annette@ARB  
**Cc:** Brooks, Sheryl@ARB; 'Costantino, Jon'; Lewis, Judy@ARB; Preston, Terone@ARB; Stroud, Ken@ARB; Castronovo, Cindy@ARB; 'mstephan@arb.ca.gov'; Singh, Matthew@ARB; Peter, Ellen M. @ARB; Goldstene, James@ARB; 'Terry, Lynn'; Stout, Holly@ARB; Scheible, Mike@ARB; Whitney, Daniel; Blackburn, Bill; Farr, Mary; Blakeslee, Jeannie@ARB; 'Kennedy, Kevin'; Bode, Richard@ARB; 'Chang, Edie'  
**Subject:** Instructions for documenting climate change resources.  
**Attachments:** FY 07-08 AB 32 hires updated 4-30-09.xls; FY BCP 08-09 AB 32 hires.xls; ARB CC Staffing Resources FY07-08 for assignment.xls; ARB CC Staffing Resources FY08-09 for assignment.xls

Division Chiefs: Thank you for assistance with this project on such a tight turnaround. This e-mail documents the instructions we discussed at our meeting this afternoon. Please e-mail your spreadsheet to Edie and Jon by Friday COB. Our work and home e-mail addresses (since the building power will be down this weekend) and [echang@arb.ca.gov](mailto:echang@arb.ca.gov), [jcostant@arb.ca.gov](mailto:jcostant@arb.ca.gov); [ecostant@arb.ca.gov](mailto:ecostant@arb.ca.gov)

I have attached two spreadsheets – one for fiscal year 2007/2008 and one for fiscal year 2008/2009. When you save them, please put your division name in the title. Please review and update these spreadsheets to reflect the percent of time each staff person in your division worked on ARB's climate program in the appropriate fiscal year, and to identify the programs in which they worked. The spreadsheets include a few examples at the beginning. Please review and update the columns with turquoise headings.

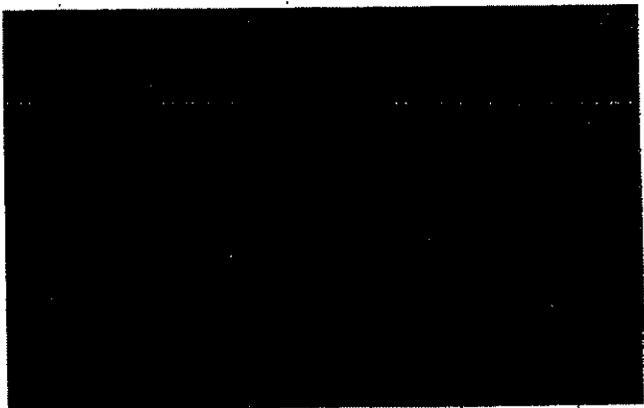
- The spreadsheet should include all staff working on climate change mitigation activities, including those working 5% or less time on the program. Please check to ensure that the spreadsheet includes all staff in your division that it should (we didn't get all of the last round of updates in), and that it doesn't include staff who didn't work on climate programs.
- Program areas are included in drop-down menus on the spreadsheets. We have provided space to fill in 3 programs for each staff person. If you have staff who worked on more than three programs during one fiscal year, please note that in the Notes column. If you need to add a program area that is not on the list, please do that in the Notes column.
  - Do not include staff time for drayage trucks, or increased anti-idling programs. For measures that are primarily pursued for diesel or other reductions (e.g. shore power), include only the time for climate change-related work.
  - Support for/participation in advisory committees should be included with the appropriate measure (e.g. the forest working group would be considered part of the forest accounting program); support for ETAAC and EJAC should be included in the Scoping Plan program.
  - Support for/participation in the Climate Action Team subgroups should be included with the appropriate measure; support for the broader CAT should be included in the State Agency Coordination program.
  - Please call Edie or Jon if you have questions about other specific activities.
- Provide your best estimate of start and end dates. We have attached hiring status report for 2007/2008 and 2008/2009 which should help with estimates for staff hired to fill budgeted vacancies. ASD is producing a report for all personnel transactions in 2007/2008 and 2008/2009 which we will send along as soon as we get it.
  - If an employee started after the 1<sup>st</sup> of the month (e.g. July 2), please use the 1<sup>st</sup> of the following month as their start date.

- o If an employee transferred from your division to another division to work on climate, and they transferred before the end of the month (e.g. July 29), please assume this employee was in your division for the entire month.
- If you know that an employee was out of the office for more than a month during the fiscal year, please note that (and the reason – vacation, maternity leave, etc.) in the Notes column
- As you review and update the spreadsheet, please be conservative in your assumptions. Don't round. We'll round at the end so it's done consistently.

If you have questions, please call Edie at (916) 764-8953 (cell phone) or Jon at (916) 837-8184 (cell phone).

TAB C

NAME	Revised % of Time FY 2007-2008	Product FY 2007-2008	Revised % of Time FY 2008-2009	Product FY 2008-2009
	10%	Pavley Analysis; GHG Model Development	10%	Pavley Analysis; GHG Model Development
	30%	EMFAC Methane Emission Rates	5%	EMFAC Methane Emission Rates
	4%	Pavley Analysis	0%	
	20%	Low Carbon Fuel Standard; CNG Analysis; Energy Calculations; EMFAC CO2 Emission Rates	25%	Low Carbon Fuel Standard; CNG Analysis; Energy Calculations; EMFAC CO2 Emission Rates
	5%	Responding to Industry and Consultant Requests; EMFAC CO2 Emission Rates	5%	Responding to Industry and Consultant Requests; EMFAC CO2 Emission Rates
	0%	Vehicle Fleet Mix and Pavley Analysis	10%	Managing UC-Riverside GHG Contract
	25%	EMFAC N2O Emission Rates	0%	Vehicle Fleet Mix and Pavley Analysis
	30%	Smartways Rule Development	5%	EMFAC N2O Emission Rates
	20%	Analysis of GHG Emission Rates for Off-Road Engines in ARB Certification Database	20%	Smartways Rule Development
	25%	Reconciliation of OFFROAD and Fuel Based GHG Inventories	30%	Analysis of GHG Emission Rates for Off-Road Engines in ARB Certification Database
	5%	Updating GHG Emission Rates for Pleasure Craft Inventory	0%	
	10%	Ocean-Going Vessel and Goods Movement GHG Assessments	10%	Updating GHG Emission Rates for Pleasure Craft Inventory
	10%		10%	Ocean-Going Vessel and Goods Movement GHG Assessments



25%	GHG Model Development (Link and Grid)	20%	GHG Model Development (Link and Grid)
30%	Managing UC-Riverside GHG Contract; GHG Model Development (Prototype)	5%	
15%	Truck Model GHG Assessment	10%	Truck Model GHG Assessment
10%	CNG Analysis	10%	CNG Analysis
15%	Goods Movement Efficiency Analysis	80%	Freight Model Development for GHG Assessment; Supporting Measure 6 (Goods Movement GHG) in Scoping Plan
10%	Management of Staff GHG Related Projects	10%	Management of Staff GHG Related Projects
	GHG Model Development (Link and Grid); MOVES Assessment; EMFAC Update		
50%		20%	MOVES Assessment; EMFAC Update

2007-08 FY

Employee	% time on CC
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	75
	75
	100
	100
	50
	75
	75
	100
	50
	100
	50
<b>Total Pys dedicated</b>	<b>20.5</b>

2008-09 FY

Employee	% time on CC
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	100
	75
	75
	100
	100
	60
	85
	85
	100
	95
	100
	75
<b>Total Pys dedicated</b>	<b>24.5</b>

PTSD FY 2007-08

Respondent:

For each eligible program, provide the following information for technical staff:

2007-2008

Work Product: EMISSION INVENTORY/Mandatory Reporting/  
Protocol Development

Budgeted Full-Time staff: 17 for permanent months starting July 2007

Budgeted Part-Time staff:      for      months starting     

Other Full-Time staff: 5 for permanent months starting July 2007

Other Part-Time staff:      for      months starting     

Notes:

Work Product: 2007-2008 Forest Target and Accounting

Budgeted Full-Time staff: 0 for      months starting     

Budgeted Part-Time staff:      for      months starting     

Other Full-Time staff: 2 for permanent months starting July 2007

Other Part-Time staff:      for      months starting     

Notes:

2007-08  
Work Product: Landuse and Transportation

Budgeted Full-Time staff: 0 for      months starting     

Budgeted Part-Time staff:      for      months starting     

Other Full-Time staff: 2 for permanent months starting July 2007

Other Part-Time staff:      for      months starting     

Notes: EXcludes resources for CEQA and SB375  
which have independent requirements

Total 2007-08      26 P.Ys  
17 P.Ys Budgeted

Respondent: PTSD FY 2008-09

Work Product: 2008-09 Emission Inventory / Mandatory Reporting / Protocol Development

Budgeted Full-Time staff: 20 for permanent months starting July 2008  
Budgeted Part-Time staff: \_\_\_\_\_ for \_\_\_\_\_ months starting \_\_\_\_\_  
Other Full-Time staff: 5 for permanent months starting July 2008  
Other Part-Time staff: \_\_\_\_\_ for \_\_\_\_\_ months starting \_\_\_\_\_

Notes:

Work Product: 2008-09 Forest Target and Accounting

Budgeted Full-Time staff: 0 for \_\_\_\_\_ months starting \_\_\_\_\_  
Budgeted Part-Time staff: \_\_\_\_\_ for \_\_\_\_\_ months starting \_\_\_\_\_  
Other Full-Time staff: 2 for permanent months starting July 2008  
Other Part-Time staff: \_\_\_\_\_ for \_\_\_\_\_ months starting \_\_\_\_\_

Notes:

Work Product: 2008-09 Land Use and Transportation

Budgeted Full-Time staff: \_\_\_\_\_ for \_\_\_\_\_ months starting \_\_\_\_\_  
Budgeted Part-Time staff: \_\_\_\_\_ for \_\_\_\_\_ months starting \_\_\_\_\_  
Other Full-Time staff: 2 for permanent months starting July 2008  
Other Part-Time staff: \_\_\_\_\_ for \_\_\_\_\_ months starting \_\_\_\_\_

Notes: Excludes Resources for CETA aid SB 375 which have independent requirements

Total 2008-09 29 Pys 20 Pys Budgeted

**Ochoa, Patricia@ARB**

---

**From:** Peterson, Terri@ARB  
**Sent:** Thursday, April 02, 2009 6:46 PM  
**To:** Chang, Edie@ARB; Costantino, Jon@ARB  
**Cc:** Welty, Bill@ARB; Smalley, Sue@ARB; Peterson, Terri@ARB  
**Subject:** RE: OIS CC Positions  
**Attachments:** OIS - Climate Change Staffing Resources 4-2-09 revised.xls

Hi Edie and Jon,

Attached is the final version of the OIS Climate Change staffing resources spreadsheet. Please delete the previous version sent to you this afternoon. Sorry for the confusion.

-Terri Peterson  
OIS

---

**From:** Peterson, Terri@ARB  
**Sent:** Thursday, April 02, 2009 2:06 PM  
**To:** Chang, Edie@ARB  
**Cc:** Costantino, Jon@ARB; Welty, Bill@ARB; Smalley, Sue@ARB  
**Subject:** OIS CC Positions

Hi Edie,

Attached is the OIS Climate Change PY spreadsheet. Thank you (and Jon) for your assistance. If you have any questions, please let us know.

Thanks,  
Terri Peterson

**ATTORNEY-CLIENT CONFIDENTIAL WORK PRODUCT**

**Air Resources Board  
Climate Change Staffing Resources**

	2007-08 FY	2008-09 FY (Year-to-Date)
<u>Division</u>	<u>Employee Name (Last, First)</u>	<u>Employee Name (Last, First)</u>
<u>Office of Information Services</u>	<u>% of Time</u>	<u>% of Time</u>
	Bill Welty	21%
	Terri Peterson	16%
<b>Office Systems Management Section</b>		
	Ed Przepiorski	18%
	Vida Gaston	30%
	Ken Couser	28%
	Lori Hayes	10%
	Glenda Muschetto	25%
	Cindy Esparza	25%
	Diana Doolin	10%
	Susan Paul	18%
	Pat Borrowman Sledge	30%
	David Darnell	15%
	Suzanne Fallon	15%
	Eileen Miller	20%

**ATTORNEY-CLIENT CONFIDENTIAL WORK PRODUCT**

**Air Resources Board  
Climate Change Staffing Resources**

2007-08 FY

2008-09 FY (Year-to-Date)

Employee Name  
(Last, First)

Employee Name  
(Last, First)

Division

% of Time

% of Time

**Office of Information Services**

**Network Computing Services Section**

Susan Smalley  
Judy Butz  
Vince Hale  
Mark Watkins  
Saif Ali  
Hoang Nguyen  
Cheo Coddia  
Tony Nardella  
John Cristodore  
Jon Heibeck  
Don Villanueva  
Harvey Hayes

15%  
18%  
20%  
20%  
20%  
50%  
50%  
25%  
25%  
18%  
35%  
50%

Susan Smalley  
Judy Butz  
Vince Hale  
Mark Watkins  
Saif Ali  
Hoang Nguyen  
Cheo Coddia  
Tony Nardella  
John Cristodore  
Jon Heibeck  
Don Villanueva  
Harvey Hayes  
Matt Curran  
Ken Dean  
Nate Black

18%  
22%  
22%  
15%  
25%  
65%  
60%  
25%  
25%  
20%  
35%  
65%  
25%  
8%  
8%

**ATTORNEY-CLIENT CONFIDENTIAL WORK PRODUCT**

**Air Resources Board  
Climate Change Staffing Resources**

	<b>2007-08 FY</b>	<b>2008-09 FY (Year-to-Date)</b>
<u>Division</u>	<u>Employee Name</u>	<u>Employee Name</u>
<u>Office of Information Services</u>	<u>(Last, First)</u>	<u>(Last, First)</u>
	<u>% of Time</u>	<u>% of Time</u>

**Mobile Source & Air Quality Systems Development**

Shiuh-Lin Lee	10%	Shiuh-Lin Lee	10%
Mark Urquhart-Webb	25%	Mark Urquhart-Webb	25%

**Stationary Source & Emission Inventory Systems Development**

Harry Ng	15%	Harry Ng	15%
Steven Kuns	15%	Steven Kuns	17%
Steve Magee	15%	Steve Magee	17%
Larry Hoang	18%	Darrell Leu	18%
Glenn Kuhn	18%	Larry Hoang	18%
Ray Ding	20%	Glenn Kuhn	18%

**Internet Systems Management**

Bill Fell	18%	Bill Fell	20%
Darrell Leu	20%	Ray Ding	15%
		Theresa Clark-Sjaaheim	5%

**ATTORNEY-CLIENT CONFIDENTIAL WORK PRODUCT**

**Air Resources Board  
Climate Change Staffing Resources**

2007-08 FY      2008-09 FY (Year-to-Date)

<u>Division</u>	<u>Employee Name (Last, First)</u>	<u>% of Time</u>	<u>Employee Name (Last, First)</u>	<u>% of Time</u>
-----------------	--	------------------	--	------------------

**Office of Information Services**

753%

897%

TAB D

ICSTAR014 3900 (DEST: A1 ARL2) PM, 05,4,1  
 FISCAL MONTH: 07 JANUARY \*\*\*\*\* 5 (PCA ) 4 (AGYOBJ) 1 (FUND ) (FUND CALL ) (GL CALL )

STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

**CALSTARS**

\*\*\*\*\* RUN:02/13/09 TIME:06.00

\*\*\*\*\* PAGE 271

FY: 08  
 FUND: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 FUND SOURCE: T TRANSPORTATION FUNDS  
 PROGRAM: 72 DIVISION COSTS  
 ELEMENT: 32 RESEARCH DIVISION (RO)  
 \*\*\*\*\*  
 PROGRAM: CMP TSK PCA

OBJECT	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOC ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
010 000 72310	RD - MANAGEMENT/LIBRARY		10,856.00	75,992.00	0.00	75,992.00	0.00
1 01 003 00	CIVIL SERVICE-PERM		500.00	500.00	0.00	500.00	0.00
1 01 063 10	BOARD & COMMITTEE ME		660.88	2,981.34	0.00	2,981.34	0.00
1 03 103 00	OASDI		4.25	28.13	0.00	28.13	0.00
1 03 105 00	HEALTH/WELFARE INS		1,799.27	12,592.90	0.00	12,594.90	0.00
1 03 125 00	RETIREMENT		30.94	30.94	0.00	30.94	0.00
1 03 125 00	WORKERS' COMPENSATIO		890.01	6,088.75	0.00	6,088.75	0.00
1 03 134 00	OTHER-STAFF BENEFITS		4,368.70	13,190.09	0.00	13,190.09	0.00
1 03 135 00	R.T. SUBSIDY		8.35	58.45	0.00	58.45	0.00
1 03 137 00	LIFE INSURANCE		158.91	1,090.93	0.00	1,090.93	0.00
0*	MEDICARE TAXATION		0.00	112,555.53	0.00	112,555.53	0.00
0*	TOTAL CAT 1		19,277.31	112,555.53	0.00	112,555.53	0.00
3 11 205 00	DUES & MEMBERSHIPS		200.00	200.00	0.00	200.00	0.00
3 11 206 00	MISC OFFICE SUPPLIES		6,011.38	6,011.38	0.00	6,981.38	0.00
3 11 217 00	MTE/CONF/EXHIBIT/SHO		375.00	12,409.00	0.00	12,409.00	0.00
3 11 223 00	LIBRARY PURCH/SUSCR		22,186.64	27,718.22	12,835.09	40,553.31	0.00
3 11 227 20	OFFICE EQUIPMENT, REN		0.00	0.00	17.47	17.47	0.00
3 11 238 00	NOC-GOODS-GEN EXP		1,105.98	6,241.13	612.23	6,853.36	0.00
3 11 239 00	NOC-SERV/RENT-GEN EX		162.78	475.97	0.00	475.97	0.00
3 11 239 20	GENERAL EXPENSE - OT		0.00	1,584.00	701.00	2,785.00	0.00
3 12 242 00	PAMPHLT/LEAFLT/BROCH		45.00	45.00	0.00	45.00	0.00
3 12 244 20	OFFICE COPIER EXPENS		0.00	206.46	597.54	804.00	0.00
3 13 252 00	CELL PHONES, PDA, PAGE		1,262.35	6,477.65	0.00	6,477.65	0.00
3 17 292 00	PER DIEM-I/S		1,151.50	2,218.00	0.00	2,218.00	0.00
3 17 293 00	VEHICLE, GS-I/S		0.00	3,340.98	0.00	3,340.98	0.00
3 17 294 00	COMMERCIAL AIR-I/S		233.00	7,275.00	0.00	7,275.00	0.00
3 18 312 00	OTHER TRANSPORT-1S		885.80	3,112.01	0.00	3,112.01	0.00
3 18 314 00	PER DIEM-O/S		564.91	564.91	0.00	564.91	0.00
3 18 314 00	COMMERCIAL AIR-O/S		0.00	2,006.52	0.00	2,006.52	0.00
3 18 315 00	OTHER TRANSPORT-O/S		101.70	1,011.70	0.00	1,011.70	0.00
3 21 332 00	TUITN/REGISTRATN FEE		1,288.00	1,322.74	0.00	1,322.74	0.00
3 23 343 00	RENT-BLDG/GRND (NON S		390.00	100,483.10	177,528.83	278,011.93	0.00
3 23 345 10	RENT - PARKING		0.00	3,796.38	0.00	3,796.38	0.00
3 23 345 00	SECURITY		71.09	252.81	34.35	287.16	0.00
3 23 358 00	NOC-SERVICES-FAC OPS		0.00	0.00	8,799.75	8,799.75	0.00

ICSTAR014 3900 (DEST: A1 ARL2) PM, 0.5411 5 (PCA) 4 (AGYOBJ) 1 (FUND) ( FUND(ALL) ) GL(ALL) )  
 FISCAL MONTH: 07 JANUARY

STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

\*\*\*\*\* RUN:02/13/09 TIME:06.00

\*\*\*\*\*  
 FUND: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 PROGRAM: T TRANSPORTATION FUNDS  
 ELEMENT: 72 DIVISION COSTS  
 32 RESEARCH DIVISION (RD)  
 \*\*\*\*\*  
 PROGRAM: ---  
 CMP TSK PCA

C	OB	DEF	AGY	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOE ENC/OBLG	AVAILABLE BALANCE	PCT EXP
3	23	358	10	MONTHLY BUILDING EXP	0.00	137.23	137.23	127.91	265.14	0
3	25	398	00	OTHER-INTERDEPT	0.00	0.00	0.00	6,458.00	6,458.00	0
3	26	418	20	OTHER EXT CONTRACTS	0.00	0.00	0.00	149,544.50	149,544.50	0
3	29	445	00	SOFTWARE-IT PURCH,LI	0.00	16.57	4,524.77	169.61	4,694.38	0
3	33	545	00	HARDWARE-IT PURCH,LI	0.00	0.21	1,051.24	201.31	1,252.55	0
0*	TOTAL	CAT 3		INTEREST PENALTIES	0.00	0.00	2.06	0.00	2.06	0
0*	TOTAL	CAT 4		BD OF CONTROL CLAIMS	0.00	0.00	191,558.26	358,597.59	550,155.85	0
0*	TOTAL	CAT 5		INTERNAL COST RECOVER	0.00	0.00	11.90	0.00	11.90	0
0*	TOTAL	PCA 72310			0.00	55,466.55	304,125.69	358,597.59	662,723.28	0
0*	TOTAL	COMP 010			0.00	0.00	0.00	0.00	0.00	0
0020	000	72320		RD - RESRCH & ECON STUDIES SECTIONS	0.00	10,339.00	72,368.00	0.00	72,368.00	0
1	01	003	00	CIVIL SERVICE-PERM	0.00	0.00	301.30	0.00	301.30	0
1	03	103	00	OASDI	0.00	631.17	3,165.50	0.00	3,165.50	0
1	03	103	00	HEALTHY/WELFARE INS	0.00	5.22	33.59	0.00	35.59	0
1	03	106	00	RETIREMENT	0.00	1,713.59	11,994.29	0.00	11,994.29	0
1	03	134	00	OTHER-STAFF BENEFITS	0.00	1,134.69	7,763.79	0.00	7,763.79	0
1	03	135	00	LIFE INSURANCE	0.00	8.35	58.45	0.00	58.45	0
1	03	137	00	MEDICARE TAXATION	0.00	147.61	1,038.02	0.00	1,038.02	0
0*	TOTAL	CAT 1			0.00	13,979.63	96,724.94	0.00	96,724.94	0
3	11	238	00	NOC-GOODS-GEN EXP	0.00	0.00	165.00	0.00	165.00	0
3	11	239	20	GENERAL EXPENSE - OT	0.00	11.98	78.59	421.41	500.00	0

TESTAR014 3900 (DEST: AL ARL2) PM, 0:54:11  
 FISCAL MONTH: 07 JANUARY \*\*\*\*\* 5(PCA) (4(GAGYORJ) I(FUND) FUND(CALL) GL(CALL))

\*\*\*\*\* RUN:02/13/09 TIME:06.00

EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

PAGE 273

\*\*\*\*\*  
 FUND SOURCE: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 PROGRAM: T TRANSPORTATION FUNDS  
 ELEMENT: 72 DIVISION COSTS  
 PROGRAM: 32 RESEARCH DIVISION (RD)  
 \*\*\*\*\*  
 PROGRAM: CWP TSK PCA

OBJECT	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOE ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
3 13 252 00	CELL PHONES, PDA, PAGE	0.00	12.98	150.86	0.00	150.86	0
3 17 294 00	COMMERCIAL AIR-I/S	0.00	0.00	204.00	0.00	204.00	0
3 17 295 00	OTHER TRANSPORT-IS	0.00	0.00	20.50	0.00	20.50	0
3 24 362 00	ELECTRICITY	0.00	55.58	419.96	0.00	419.96	0
3 25 398 00	OTHER-INTERDEPT	0.00	0.00	0.00	346,200.15	346,200.15	0
3 26 418 20	OTHER EXT CONTRACTS	0.00	0.00	0.00	249,978.00	249,978.00	0
3 33 524 00	VEHICLE OPERATIONS	0.00	0.00	220.00	0.00	220.00	0
0*TOTAL CAT 3	ICAT	0.00	80.54	1,258.91	596,599.56	597,858.47	0
6 61 702 02	INTERNAL COST RECOVER	0.00	0.00	0.00	52,599.00	52,599.00	0
0*TOTAL CAT 6	INTERNAL COST RECOVER	0.00	14,060.17	97,983.85	52,599.00	747,182.41	0
9 91 912 00	INTERNAL COST RECOVER	0.00	0.00	97,983.85	649,198.56	747,182.41	0
0*TOTAL CAT 9	INTERNAL COST RECOVER	0.00	0.00	0.00	649,198.56	747,182.41	0
0*TOTAL PCA 72320		0.00	0.00	0.00	0.00	0.00	0
0030 000 72330	RD - HEALTH & EXPOSURE ASSESS BRANCH	0.00	4,999.00	4,999.00	0.00	4,999.00	0
3 11 205 00	DUES & MEMBERSHIPS	0.00	0.00	5,285.00	0.00	5,285.00	0
3 11 217 00	MTG/CONF/EXHIBIT/SHO	0.00	0.00	10,028.02	0.00	10,028.02	0
3 11 238 00	NOC-GOODS-GEN EXP	0.00	4,999.99	2,445.00	2,445.00	4,890.00	0
3 11 239 00	NOC-SERV/RENT-GEN EX	0.00	0.00	2,445.00	2,527.02	3,240.00	0
3 12 244 20	OFFICE COPIER EXPENS	0.00	0.00	712.98	0.00	262.71	0
3 13 252 00	CELL PHONES, PDA, PAGE	0.00	43.95	262.71	0.00	182.71	0
3 17 294 00	COMMERCIAL AIR-I/S	0.00	0.00	182.00	0.00	21.90	0
3 17 295 00	OTHER TRANSPORT	0.00	0.00	21.90	0.00	21.90	0
3 25 398 00	OTHER-INTERDEPT	0.00	0.00	0.00	333,501.00	333,501.00	0
0*TOTAL CAT 3	INTERNAL COST RECOVER	0.00	12,487.94	23,936.61	333,473.02	362,409.63	0
9 91 912 00	INTERNAL COST RECOVER	0.00	0.00	23,936.61	338,473.02	362,409.63	0

ICSTAR014 3900 (BEST: AI AR12) PM, 05:41:57 (PCA) (4AGY0B1) (FUND) (FUND CALL) (GL CALL)  
 FISCAL MONTH: 07 JANUARY \*\*\*\*\* STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT AS OF 01/31/09

\*\*\*\*\* RUN:02/13/09 TIME:06.00 \*\*\*\*\* PAGE 274

\*\*\*\*\*  
 FEY: 08  
 FUND: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 FUND SOURCE: T TRANSPORTATION FUNDS  
 PROGRAM: 72 DIVISION COSTS  
 ELEMENT: 32 RESEARCH DIVISION (RD)  
 \*\*\*\*\*  
 PROGRAM: ---  
 CMP TSK PCA

C	OB	DE	AGY	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOE ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
0*	TOTAL	CAT	9			12,487.94-	23,936.61-	338,473.02-	362,409.63	0
0*	TOTAL	PCA	72330	RD - CC CLIMATE CHANGE MITIGATION	BRANCH	0.00	0.00	0.00	0.00	0
3	11	217	00	MTG/GONF/EXHIBIT/SHO		0.00	6,000.00	0.00	6,000.00-	0
3	11	238	00	NOC-GOODS-GEN EXP		0.00	5,599.00	0.00	5,599.00-	0
3	11	239	20	GENERAL EXPENSE - OT		0.00	1,249.50	0.00	1,249.50-	0
3	17	294	00	COMMERCIAL AIR-T/S		0.00	508.00	0.00	508.00-	0
3	18	314	00	COMMERCIAL AIR-O/S		0.00	1,441.00	0.00	1,441.00-	0
3	25	398	00	OTHER-INTERDEPT		0.00	0.00	0.00	24,999.00-	0
3	26	418	20	OTHER EXT CONTRACTS		0.00	0.00	0.00	55,365.00-	0
0*	TOTAL	CAT	3			0.00	14,797.50-	80,364.00-	95,161.50-	0
9	91	912	00	INTERNAL COST RECOVER		0.00	14,797.50-	80,364.00-	95,161.50	0
0*	TOTAL	CAT	9			0.00	0.00	0.00	0.00	0
0*	TOTAL	PCA	72340			0.00	0.00	0.00	0.00	0
0030	000	72330		RD - AQ FIELD STUDIES & ADMIN BRANCH		133,445.29	897,388.49	0.00	897,388.49-	0
1	01	003	00	CIVIL SERVICE-PERMA		6,602.40	18,287.60	0.00	18,287.60-	0
1	01	033	00	CIVIL SERVICE-TEMP		8,771.66	54,374.44	0.00	54,374.44-	0
1	03	103	00	OASDI		7,774.51	4,882.67	0.00	4,882.67-	0
1	03	104	00	DENTAL INSURANCE		7,318.66	45,269.74	0.00	45,269.74-	0
1	03	105	00	HEALTH/WELFARE INS		20,661.81	142,001.67	0.00	142,001.67-	0
1	03	106	00	RETIREMENT		38.22	38.22	0.00	38.22-	0
1	03	125	00	WORKERS' COMPENSATIO		580.80	3,235.88	0.00	3,235.88-	0
1	03	132	00	NONINDUST DISABILITY		4,183.46	27,778.10	0.00	27,778.10-	0
1	03	134	10	OTHER-STAFF BENEFITS		0.00	240.00	0.00	240.00-	0
1	03	134	10	R.T. SUBSIDY		17.60	123.20	0.00	123.20-	0
1	03	135	00	LIFE INSURANCE		156.23	983.33	0.00	983.33-	0
1	03	136	00	VISION CARE		2,018.88	13,171.55	0.00	13,171.55-	0
1	03	137	00	MEDICARE TAXATION		183,979.52	1,207,774.89	0.00	1,207,774.89-	0
0*	TOTAL	CAT	1			183,979.52	1,207,774.89	0.00	1,207,774.89-	0

LCSTAR014 3900 (DEST: AI ARL2) PM, 0.5.4.1  
 FISCAL MONTH: 07 JANUARY 5(PCA) (4(ACTOBS)) (FUND(CALL)) GE(CALL)  
 STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

\*\*\*\*\* RUN:02/13/09 TIME:06.00  
 PAGE 275

\*\*\*\*\*  
 FUND: 08 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 FUND SOURCE: 0044 TRANSPORTATION FUNDS  
 PROGRAM: T  
 ELEMENT: 72 DIVISION COSTS  
 32 RESEARCH DIVISION (RD)  
 \*\*\*\*\*  
 PROGRAM: 32  
 CMP TSK PCA

OBJCT	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOC ENC/OBLG	AVAILABLE BALANCE	PCT EXP
3 11 206 00	MISC OFFICE SUPPLIES	0.00	0.00	0.00	246.69	246.69	0.0
3 11 217 00	MTG/CONF/EXHIBIT/SHO	0.00	0.00	125.00	0.00	125.00	0.0
3 11 223 00	LIBRARY PURCH/SUBSCR	0.00	18,948.38	20,794.36	0.00	20,794.36	0.0
3 11 226 10	OFFICE FURNITURE (LE	0.00	0.00	0.00	200.33	200.33	0.0
3 11 239 00	NOC-SERV/RENT-GEN EX	0.00	0.00	1,888.32	0.00	1,888.32	0.0
3 13 252 00	CELL PHONES, PDA, PAGE	0.00	0.00	4,477.23	0.00	4,477.23	0.0
3 17 292 00	PER DIEM-I/S	0.00	0.00	138.49	0.00	138.49	0.0
3 17 294 00	COMMERCIAL AIR-I/S	0.00	927.00	5,124.00	0.00	5,124.00	0.0
3 17 295 00	OTHER TRANSPOR-TIS	0.00	146.20	1,384.78	0.00	1,384.78	0.0
3 21 332 00	TULTN/REGISTRATN FEE	0.00	0.00	1,967.74	0.00	1,967.74	0.0
3 23 343 00	RENT-BLDG/GRND(NON S	0.00	0.00	2,973.00	0.00	2,973.00	0.0
3 24 362 00	ELECTRICITY	0.00	0.00	35.02	0.00	35.02	0.0
3 25 398 00	OTHER-INTERDEPT	0.00	0.00	0.00	178,687.58	178,687.58	0.0
3 26 418 20	OTHER EXT CONTRACTS	0.00	0.00	0.00	924,739.00	924,739.00	0.0
0*TOTAL CAT 3	INTERNAL COST RECOVER	0.00	20,162.07	38,201.07	1,103,873.60	1,142,074.67	0.0
0*TOTAL CAT 9		0.00	204,141.59	1,245,975.96	1,103,873.60	2,349,849.56	0.0
0*TOTAL PCA 72350		0.00	204,141.59	1,245,975.96	1,103,873.60	2,349,849.56	0.0
0030 000 72360	RD - CC MITIGATION & EMISSION BRANCH	0.00	151,958.73	1,011,836.36	0.00	1,011,836.36	0.0
1 01 003 00	CIVIL SERVICE-PERM	0.00	3,603.90	20,568.60	0.00	20,568.60	0.0
1 01 033 00	CIVIL SERVICE-TEMP	0.00	0.00	407.42	0.00	407.42	0.0
1 01 083 00	OVERTIME	0.00	8,342.57	54,786.75	0.00	54,786.75	0.0
1 03 103 00	OASDI	0.00	8,677.20	4,608.84	0.00	4,608.84	0.0
1 03 104 00	DENTAL INSURANCE	0.00	8,737.66	59,925.34	0.00	59,925.34	0.0
1 03 105 00	HEALTH/WELFARE INS	0.00	22,049.73	150,201.52	0.00	150,201.52	0.0
1 03 106 00	RETIREMENT	0.00	36.40	36.40	0.00	36.40	0.0
1 03 125 00	WORKERS' COMPENSATIO	0.00	4,879.91	33,350.37	0.00	33,350.37	0.0
1 03 134 00	OTHER-STAFF BENEFITS	0.00	0.00	975.00	0.00	975.00	0.0
1 03 134 10	R.T. SUBSIDY	0.00	17.60	123.20	0.00	123.20	0.0
1 03 135 00	LIFE INSURANCE	0.00	0.00	0.00	0.00	0.00	0.0

ICSTAR014 3900 (DEST: AI ARL2) PM, 0.5.4.1  
 FISCAL MONTH: 07 JANUARY \*\*\*\*\* 5(CCA) 4(AGYOB1) 1(FUND) FUND(CALL) GL(CALL)

STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

\*\*\*\*\* RUN:02/13/09 TIME:06:00

PAGE 276

\*\*\*\*\*  
 FUND: 08 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 FUND SOURCE: 0044 TRANSPORTATION FUNDS  
 PROGRAM: T DIVISION COSTS  
 ELEMENT: 32 RESEARCH DIVISION (RD)  
 \*\*\*\*\*  
 PROGRAM  
 CMP TSK PCA

OBJECT	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOC ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
1 03 136 00	VISION CARE	0.00	137.85	964.95	0.00	964.95	0.00
1 03 137 00	MEDICARE TAXATION	0.00	2,003.34	13,309.87	0.00	13,309.87	0.00
0*TOTAL CAT 1		0.00	202,444.89	1,351,094.62	0.00	1,351,094.62	0.00
3 11 205 00	DUES & MEMBERSHIPS	0.00	0.00	200.00	0.00	200.00	0.00
3 11 206 00	MISC OFFICE SUPPLIES	0.00	0.00	394.81	0.00	394.81	0.00
3 11 217 00	MTG/CONF/EXHIBIT/SHO	0.00	374.25	2,053.25	0.00	2,053.25	0.00
3 11 226 00	MINOR EQUIPMENT	0.00	0.00	0.00	0.00	0.00	0.00
3 13 252 00	CELL PHONES, PDA, PAGE	0.00	46.25	270.44	54.24	324.68	0.00
3 17 292 00	PER DIEM-I/S	0.00	0.00	3,796.54	0.00	3,796.54	0.00
3 17 293 00	VEHICLE, GS-I/S	0.00	0.00	2,811.50	0.00	2,811.50	0.00
3 17 294 00	COMMERCIAL AIR-I/S	0.00	0.00	2,298.00	0.00	2,298.00	0.00
3 17 295 00	OTHER TRANSPORT-1S	0.00	1,211.00	2,730.12	0.00	2,730.12	0.00
3 18 312 00	PER DIEM-O/S	0.00	3,039.04	3,494.75	0.00	3,494.75	0.00
3 18 314 00	COMMERCIAL AIR-O/S	0.00	2,091.30	3,417.80	0.00	3,417.80	0.00
3 18 315 00	OTHER TRANSPORT-O/S	0.00	317.44	570.33	0.00	570.33	0.00
3 21 332 00	TUITION/REGISTRATN FEE	0.00	0.00	464.48	0.00	464.48	0.00
3 25 398 00	OTHER-INTERDEPT	0.00	0.00	0.00	0.00	0.00	0.00
3 26 418 20	OTHER EXT CONTRACTS	0.00	0.00	0.00	0.00	0.00	0.00
0*TOTAL CAT 3		0.00	7,413.05	4,999.00	210,008.00	210,008.00	0.00
9 91 912 00	INTERNAL COST RECOVER	0.00	209,857.94	1,375,065.64	170,527.00	1,755,870.25	0.00
0*TOTAL CAT 9		0.00	209,857.94	1,375,065.64	380,804.61	1,755,870.25	0.00
0030 000 72370	RD - HEALTH & EXPOSURE ASS BRANCH	0.00	0.00	0.00	380,804.61	1,755,870.25	0.00
1 01 003 00	CIVIL SERVICE-PERM	0.00	147,458.82	1,101,815.33	0.00	1,101,815.33	0.00
1 01 033 00	CIVIL SERVICE-TEMP	0.00	9,808.80	24,115.00	0.00	24,115.00	0.00
1 03 103 00	OASDI	0.00	8,901.87	65,113.28	0.00	65,113.28	0.00
1 03 104 00	DENTAL INSURANCE	0.00	786.61	5,506.27	0.00	5,506.27	0.00
1 03 105 00	HEALTH/WELFARE INS	0.00	10,945.87	72,558.61	0.00	72,558.61	0.00
1 03 106 00	RETIREMENT	0.00	19,545.85	147,747.47	0.00	147,747.47	0.00

1CSTARQ14 3900 (DEST: A1 APR12) PM, 05:41, 5(CCA) (AGYOB) (FUND) (GL) (ALL)  
 FISCAL MONTH: 07 JANUARY STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

\*\*\*\*\* PAGE 277 \*\*\*\*\*

FFY: 08  
 FUND SOURCE: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 PROGRAM: T TRANSPORTATION FUNDS  
 ELEMENT: 32 DIVISION COSTS  
 RESEARCH DIVISION (RD)  
 CIP TSK PCA

OBJECT-AGY	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLDC ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
1 03 125 00	WORKERS' COMPENSATION	0.00	41.86	41.86	0.00	41.86	0
1 03 134 00	OTHER-STAFF BENEFITS	0.00	2,518.32	24,194.14	0.00	24,194.14	0
1 03 134 10	R.T. SUBSIDY	0.00	0.00	864.50	0.00	864.50	0
1 03 135 00	LIFE INSURANCE	0.00	22.00	180.40	0.00	180.40	0
1 03 136 00	VISION CARE	0.00	137.85	964.95	0.00	964.95	0
1 03 137 00	MEDICARE TAXATION	0.00	2,124.10	15,934.36	0.00	15,934.36	0
0*TOTAL CAT 1		0.00	202,391.95	1,459,036.17	0.00	1,459,036.17	0
3 11 217 00	MTG/CONF/EXHIBIT/SHO	0.00	0.00	2,090.00	0.00	2,090.00	0
3 13 252 00	CELL PHONES, PDA, PAGE	0.00	44.79	116.44	0.00	116.44	0
3 17 292 00	PER DIEM-I/S	0.00	0.00	5,287.35	0.00	5,287.35	0
3 17 293 00	VEHICLE, GS-I/S	0.00	0.00	2,152.53	0.00	2,152.53	0
3 17 294 00	COMMERCIAL AIR-I/S	0.00	463.50	3,107.00	0.00	3,107.00	0
3 17 295 00	OTHER TRANSPORT-IS	0.00	529.44	1,550.80	0.00	1,550.80	0
3 18 312 00	PER DIEM-O/S	0.00	300.22	300.22	0.00	300.22	0
3 18 314 00	COMMERCIAL AIR-O/S	0.00	0.00	321.00	0.00	321.00	0
3 18 315 00	OTHER TRANSPORT-O/S	0.00	41.00	41.00	0.00	41.00	0
3 21 332 00	TULIN/REGISTRATN FEE	0.00	450.00	6,839.48	0.00	6,839.48	0
3 25 398 00	OTHER-INTERDEPT	0.00	0.00	0.00	0.00	0.00	0
3 26 418 20	OTHER EXT CONTRACTS	0.00	0.00	0.00	0.00	0.00	0
3 32 451 20	MAJOR EQUIPMENT	0.00	0.00	38,874.50	0.00	38,874.50	0
0*TOTAL CAT 3		0.00	1,828.95	60,680.32	0.00	400,096.39	0
- 9 91 912 00	INTERNAL COST RECOVER	0.00	204,220.90	1,519,716.49	340,096.39	1,859,812.88	0
0*TOTAL PCA 9		0.00	0.00	0.00	0.00	0.00	0
0030 000 72380	RD - AQ FIELD STUDIES & ADM BRANCH	0.00	165,323.80	1,166,607.68	0.00	1,166,607.68	0
1 01 003 00	CIVIL SERVICE-PERM	0.00	2,231.90	7,933.39	0.00	7,933.39	0
1 01 033 00	CIVIL SERVICE-TEMP	0.00	5,985.45	69,657.49	0.00	69,657.49	0
1 03 103 00	OASDI	0.00	931.17	6,666.61	0.00	6,666.61	0
1 03 104 00	DENTAL INSURANCE	0.00			0.00		0

ICSTAR04 3900 (DEST: A1 ARLZ) PM, 0.5.4.1  
 FISCAL MONTH: 07 JANUARY  
 \*\*\*\*\*  
 STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

\*\*\*\*\* RUN:02/13/09 TIME:06.00  
 \*\*\*\*\* PAGE 278

\*\*\*\*\*  
 FFY: 08  
 FUND SOURCE: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 PROGRAM: T TRANSPORTATION FUNDS  
 ELEMENT: 72 DIVISION COSTS  
 32 RESEARCH DIVISION (RD)  
 \*\*\*\*\*  
 PROGRAM: ---  
 CMP TSK PCA

C	OB	DET	AGY	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ALLOE ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
1	03	105	00	HEALTH/WELFARE INS	0.00	11,057.54	79,224.51	0.00	79,224.51	0.00
1	03	106	00	RETIREMENT	0.00	23,409.24	165,285.02	0.00	165,285.02	0.00
1	03	125	00	WORKERS' COMPENSATIO	0.00	47.32	47.32	0.00	47.32	0.00
1	03	134	00	OTHER-STAFF BENEFITS	0.00	3,993.12	27,295.65	0.00	27,295.65	0.00
1	03	135	00	LIFE INSURANCE	0.00	17.60	123.20	0.00	123.20	0.00
1	03	136	00	VISION CARE	0.00	183.80	1,332.55	0.00	1,332.55	0.00
1	03	137	00	MEDICARE TAXATION	0.00	2,367.66	16,639.61	0.00	16,639.61	0.00
0*	TOTAL	CAT 1			0.00	219,548.60	1,540,813.03	0.00	1,540,813.03	0.00
3	11	205	00	DUES & MEMBERSHIPS	0.00	0.00	85.00	0.00	85.00	0.00
3	11	206	00	MISC OFFICE SUPPLIES	0.00	3,632.41	10,490.00	14,557.48	25,047.48	0.00
3	11	217	00	MTG/CONF/EXHIBIT/SHO	0.00	1,195.00	2,874.00	0.00	2,874.00	0.00
3	11	226	00	MINOR EQUIPMENT	0.00	0.00	2,918.52	0.00	2,918.52	0.00
3	11	238	00	OFFICE FURNITURE (LE	0.00	323.00	323.00	0.00	323.00	0.00
3	11	239	00	NOC-SERV/RENT-GEN EX	0.00	0.00	4,305.63	0.00	9,117.61	0.00
3	13	252	00	CELL PHONES, PDA, PAGE	0.00	0.00	232.85	0.00	232.85	0.00
3	17	292	00	PER DIEM-I/S	0.00	129.55	804.78	0.00	804.78	0.00
3	17	294	00	COMMERCIAL ATR-I/S	0.00	1,110.11	3,019.00	0.00	3,994.57	0.00
3	17	295	00	OTHER TRANSPORT-1S	0.00	573.00	2,019.00	0.00	2,019.00	0.00
3	18	312	00	PER DIEM-O/S	0.00	1,387.01	1,387.01	0.00	1,387.01	0.00
3	18	314	00	COMMERCIAL ATR-O/S	0.00	905.50	2,578.62	0.00	2,578.62	0.00
3	18	315	00	OTHER TRANSPORT-O/S	0.00	242.53	1,290.50	0.00	1,290.50	0.00
3	21	332	00	TULTR/REGISTRATN FEE	0.00	893.00	242.53	0.00	242.53	0.00
3	25	398	00	OTHER-INTERDEPT	0.00	0.00	14,822.48	0.00	14,822.48	0.00
3	26	418	20	OTHER EXT CONTRACTS	0.00	0.00	0.00	0.00	0.00	0.00
3	32	451	10	MINOR EQUIPMENT	0.00	2,312.80	2,312.80	0.00	81,992.40	0.00
3	32	451	20	MAJOR EQUIPMENT	0.00	17,840.87	17,840.87	0.00	2,312.80	0.00
3	33	516	00	CHEMCL/DRUG/MED/LAB	0.00	2,896.32	2,896.32	0.00	1,049.65	0.00
3	33	516	40	GAS - LAB SUPPLIES	0.00	0.00	977.99	0.00	5,047.90	0.00
3	33	524	00	VEHICLE OPERATIONS	0.00	34,830.38	73,446.32	243,865.24	317,311.56	0.00
0*	TOTAL	CAT 3		INTERNAL COST RECOVER	0.00	254,378.98	1,614,259.35	243,865.24	1,858,124.59	0.00

ICSTAR014 3900 (DEST: AL ARLZ) PM, 05411 5(PCA) 4(AGY087) 1(FUND) FUND(ALL) GL(ALL)  
 FISCAL MONTH: 07 JANUARY

\*\*\*\*\* RUN: 02/13/09 TIME: 06.00

STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

PAGE 279

\*\*\*\*\*  
 FFY: 08  
 FUND SOURCE: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 PROGRAM: T TRANSPORTATION FUNDS  
 ELEMENT: 72 DIVISION COSTS  
 32 RESEARCH DIVISTON (RD)  
 \*\*\*\*\*  
 ---PROGRAM---  
 CMP TSK PCA

OBJECT	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOC ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
C 08 DET AGY							
0*TOTAL CAT 9		0.00	254,378.98	1,614,259.35	243,865.24	1,856,124.59	.0
0*TOTAL PCA 72380		0.00	0.00	0.00	0.00	0.00	.0
0*TOTAL COMP 030		0.00	0.00	0.00	0.00	0.00	.0
0*TOTAL ELEM 32		0.00	0.00	0.00	0.00	0.00	.0

**BREAK**

12STAR014 3900 (DEST: AL ARL2) PM, 0.5.4.1  
 FISCAL MONTH: 07 JANUARY \*\*\*\*\* 5(PCA) 4(AGYOBJ) 1(FUND) FUND(CALL) GL(CALL)

\*\*\*\*\* RUN:02/13/09 TIME:06.00

STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT  
 AS OF 01/31/09

PAGE 262

\*\*\*\*\*  
 FUND: 08  
 FUND SOURCE: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 PROGRAM: T TRANSPORTATION FUNDS  
 ELEMENT: 72 DIVISION COSTS  
 EXECUTIVE OFFICE (EO)  
 \*\*\*\*\*  
 PROGRAM: 12  
 \*\*\*\*\*  
 CMP TSK PCA

C	OB	DET	AGY	OBJECT	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOC ENC/OBLG	AVAILABLE BALANCE	PCNT EXP
1	03	103	00	OASDI		0.00	579.46	3,384.85	0.00	3,384.85	0
1	03	106	00	RETIREMENT		0.00	1,577.21	11,040.46	0.00	11,040.46	0
1	03	125	00	WORKERS' COMPENSATIO		0.00	1.82	1.82	0.00	1.82	0
1	03	134	00	OTHER-STAFF BENEFITS		0.00	166.84	1,166.92	0.00	1,166.92	0
1	03	137	00	MEDICARE TAXATION		0.00	135.52	950.44	0.00	950.44	0
0*	TOTAL	CAT 1				0.00	11,977.00	83,157.54	0.00	83,157.54	0
3	14	262	20	EXPRESS MAIL		0.00	5.12	5.12	0.00	5.12	0
3	17	292	00	PER DIEM-I/S		0.00	0.00	86.00	0.00	86.00	0
3	17	294	00	COMMERCIAL AIR-I/S		0.00	0.00	319.00	0.00	319.00	0
3	17	295	00	OTHER TRANSPORT-1S		0.00	84.09	140.63	0.00	140.63	0
3	18	312	00	PER DIEM-O/S		0.00	340.79	484.00	0.00	484.00	0
3	18	314	00	COMMERCIAL AIR-O/S		0.00	0.00	484.00	0.00	484.00	0
3	18	315	00	OTHER TRANSPORT-O/S		0.00	35.56	35.56	0.00	35.56	0
0*	TOTAL	CAT 3				0.00	465.56	1,411.10	0.00	1,411.10	0
9	91	912	00	INTERNAL COST RECOVER		0.00	12,442.56	84,568.64	0.00	84,568.64	0
0*	TOTAL	CAT 9				0.00	12,442.56	84,568.64	0.00	84,568.64	0
0*	TOTAL	PCA 72150				0.00	0.00	0.00	0.00	0.00	0
0050	000	72180		EO - OFFICE OF CLIMATE CHANGE		0.00	230,705.93	1,567,121.85	0.00	1,567,121.85	0
1	01	003	00	CIVIL SERVICE-PERM		0.00	0.00	5,580.25	0.00	5,580.25	0
1	01	033	00	CIVIL SERVICE-TEMP		0.00	1,975.14	13,923.13	0.00	13,923.13	0
1	01	083	00	OVERTIME		0.00	14,157.05	94,551.18	0.00	94,551.18	0
1	03	103	00	OASDI		0.00	1,170.96	6,871.27	0.00	6,871.27	0
1	03	104	00	DENTAL INSURANCE		0.00	13,942.47	88,628.86	0.00	88,628.86	0
1	03	105	00	HEALTH/WELFARE INS		0.00	31,615.27	218,647.43	0.00	218,647.43	0
1	03	106	00	RETIREMENT		0.00	61.88	61.88	0.00	61.88	0
1	03	125	00	WORKERS' COMPENSATIO		0.00	4,896.21	35,513.12	0.00	35,513.12	0
1	03	134	00	OTHER-STAFF BENEFITS		0.00	1,987.25	6,789.75	0.00	6,789.75	0
1	03	134	10	R.T. SUBSIDY		0.00	34.75	216.85	0.00	216.85	0
1	03	135	00	LIFE INSURANCE		0.00			0.00		0

ICSTAR014 3900 (DEST: AL ARIZ) PM, 05.4.1 5(PC) 4(GAGYOB) 1(FUND) 1(FUNDCALL) GL(ALL)  
 FISCAL MONTH: 07 JANUARY \*\*\*\*\* STATE AIR RESOURCES BOARD  
 EXPENDITURES BY PROGRAM AND OBJECT AS OF 01/31/09

\*\*\*\*\* RUN:02/13/09 TIME:06.00

PAGE 263

\*\*\*\*\*  
 FUND: 0044 MOTOR VEHICLE ACCOUNT (TRANSPORTATION FUND)  
 PROGRAM: 72 TRANSPORTATION FUNDS  
 ELEMENT: 12 EXECUTIVE OFFICE (EO)  
 \*\*\*\*\*  
 PROGRAM: \*\*\*\*\*  
 CMP TSK PCA \*\*\*\*\*

OBJECT	DESCRIPTION	BUDGET PLAN	CURRENT MONTH	YEAR-TO-DATE	ENCUMBRANCES/ ALLOC ENC/OLG	AVAILABLE BALANCE	PCNT EXP
1 03 136 00	VISION CARE	0.00	257.32	1,709.34	0.00	1,709.34	0.0
1 03 137 00	MEDICARE TAXATION	0.00	3,310.92	22,687.98	0.00	22,687.98	0.0
0*TOTAL CAT 1		0.00	3,041.15	2,062,302.89	0.00	2,062,302.89	0.0
3 11 206 00	MISC OFFICE SUPPLIES	0.00	7,847.16	8,004.80	934.65	8,939.45	0.0
3 11 215 00	ADVERTISING	0.00	0.00	7,261.35	0.00	7,261.35	0.0
3 11 217 00	MTG/CONF/EXHIBIT/SHO	0.00	0.00	575.00	0.00	575.00	0.0
3 11 238 00	MOC-GOODS-GEN EXP	0.00	50.00	77.34	0.00	77.34	0.0
3 13 252 00	CELL PHONES,PDA,PAGE	0.00	183.50	1,222.90	0.00	1,222.90	0.0
3 17 292 00	PER DIEM-I/S	0.00	702.53	8,474.35	0.00	8,474.35	0.0
3 17 295 00	COMMERCIAL AIR-I/S	0.00	2,083.00	14,106.01	0.00	14,106.01	0.0
3 18 312 00	PER DIEM-O/S	0.00	1,877.85	7,995.56	0.00	7,995.56	0.0
3 18 314 00	COMMERCIAL AIR-O/S	0.00	611.50	611.50	0.00	611.50	0.0
3 18 315 00	OTHER TRANSPORT-O/S	0.00	467.00	3,403.67	0.00	3,403.67	0.0
3 21 332 00	TUITN/REGISTRATN FEE	0.00	130.36	1,130.36	0.00	1,130.36	0.0
3 26 418 20	OTHER EXT CONTRACTS	0.00	0.00	1,928.70	0.00	1,928.70	0.0
3 29 435 00	MOC-SERV-IT (SECURIT	0.00	0.00	0.00	0.00	0.00	0.0
0*TOTAL CAT 3		0.00	13,952.90	39,460.00	64,000.00	64,000.00	0.0
9 91 912 00	INTERNAL COST RECOVER	0.00	318,068.05	93,251.54	65,134.65	158,386.19	0.0
0*TOTAL CAT 9		0.00	318,068.05	2,155,554.43	65,134.65	2,220,689.08	0.0
0*TOTAL PCA 72180		0.00	0.00	0.00	0.00	0.00	0.0
0*TOTAL COMP 050		0.00	0.00	0.00	0.00	0.00	0.0
0*TOTAL ELEM 12		0.00	0.00	0.00	0.00	0.00	0.0

**TAB**

**E**



**PUBLIC  
AFFAIRS**

June 24, 2009

Ms. Mary Nichols, Chairperson  
and Members of the Air Resources Board  
California Air Resources Board  
1001 "I" Street, 23rd Floor  
Sacramento, CA 95814

Re: Public Hearing on July 25-26, to Consider Adoption of a Proposed AB 32 Cost of Implementation Fee Regulation

Dear Ms. Nichols and Members of the Air Resources Board:

On behalf of the trade associations ("Associations") listed below, we respectfully submit the following comments on the California Air Resources Board (CARB)'s Proposed AB 32 Cost of Implementation Fee Regulation ("proposed AB 32 Fee Regulation"). The Associations are:

California Business Properties Association  
California Chamber of Commerce  
California Independent Oil Marketers Association  
California League of Food Processors  
California Manufacturers & Technology Association  
California Small Business Alliance  
California Taxpayers' Association  
Howard Jarvis Taxpayers Association  
National Federation of Independent Business-California  
The California Black Chamber of Commerce  
Western States Petroleum Association

**I. INTRODUCTION**

The Associations are committed to ensuring that regulations, such as the proposed AB 32 Fee Regulation, are adopted in a fair, open, and transparent process. This is especially important where, as here, the subject Regulation will have a wide-ranging and dramatic impact on the California economy. The Legislature has made clear that any fees collected pursuant to Health & Safety Code § 38597—the source of CARB's authority here— must be assessed "on sources of greenhouse gas emissions" and "solely for the direct costs incurred" for administration of AB 32. *See* Health & Safety Code § 38597; *see also* letter from Fabian Nunez to the Assembly Daily Journal, August 31, 2006 (appended hereto as Attachment A). As discussed below, CARB staff has failed, in the public records that it has thus far provided to the Associations, to establish

that the fee compelled by the proposed AB 32 Fee Regulation will actually be collected “solely for the direct costs incurred” for AB 32 administration. CARB staff has also failed, in the public records provided thus far, to establish that the proposed fees will be imposed only on “sources of greenhouse gas emissions.” Finally, CARB is required to develop a fee regulation based upon a proper nexus between the fees collected, the fee payers, and the regulatory activity funded by the fee, and to fairly allocate the fee among fee payers. CARB has failed, in the public records provided thus far, to establish a proper nexus and a fair allocation of proposed fees.

## II. THE ASSOCIATIONS’ PUBLIC RECORDS ACT REQUESTS

On February 13, 2009, the Associations submitted a California Public Records Act (“CPRA”) request to CARB, seeking 16 categories of documents that would substantiate the basis for, and the amount of, the fees to be collected under the proposed AB 32 Fee Regulation, as well as substantiate the nexus between the fees to be paid, the fee payers, and the regulatory activity to be funded with the fees. Initially, CARB staff failed to comply with the February 13 CPRA request, and raised objections based on asserted deliberative process, attorney-client, and attorney work product privileges. Eventually, in response to the February 13, 2009 CPRA request, between March 9, 2009 and April 30, 2009—after prodding from the Associations and in four separate productions—CARB staff provided 3,227 pages, *but withheld 11,981 pages of CARB’s records*. Upon review, the Associations concluded that these records fell well short of substantiating the basis for the amount of fees to be collected through the proposed AB 32 Fee Regulation. On May 28, 2009, the Associations submitted to CARB a second and third CPRA request, covering the period through the release of the May 8, 2009 Staff Report for the proposed AB 32 Fee Regulation (“May 8 Staff Report”) and beyond, and covering the same categories of documents as the February 13 request.

On June 19, 2009, CARB staff produced approximately 5,500 pages of records in its initial response to the Associations’ second and third CPRA requests, covering the period from February 13, 2009, through May 28, 2009. After reviewing these records over the past few days, the Associations are still not able to identify the actual basis for many of the estimated cost figures that CARB staff present in the May 8, 2009 Staff Report.

As is clear from the foregoing, the Associations have been forced to review the records provided them in a very compressed time frame caused by CARB staff’s resistance to releasing appropriate supporting documentation for the proposed AB 32 Fee Regulation in a complete and timely fashion. Despite repeated attempts by Association representatives to work with CARB staff to expedite the release of records, it took CARB until April 30, 2009 to produce any substantial volume of records in response to the initial CPRA request. Records responsive to the second and third CPRA requests were only made available on June 19, 2009, four business days prior to the hearing date. CARB staff’s repeated failure to respond to the Association’s CPRA requests has severely impaired the Associations’ ability to comment fully and effectively on the proposed AB 32 Fee Regulation.

CARB staff has, by its own admission, withheld 11,981 pages of records from the Associations in response to the first CPRA request, and has withheld an as yet undisclosed number of pages from the most recent disclosure on June 19, 2009. CARB staff rationalizes its

withholding of records on unsupported and dubious claims of deliberative process and attorney-client privilege (discussed in section IV, below). Accordingly, the Associations are basing their comments solely on the review of those limited and incomplete public records that have been provided to them, and that they have been forced to review in an unreasonably short period of time. Therefore, the Associations emphasize that their comments are not exhaustive of the deficiencies in the record relating to the proposed AB 32 Fee Regulation, but merely indicative of the types of deficiencies the Associations have identified. In reviewing the limited and incomplete records that CARB has provided them, the Associations have identified significant data gaps between the information that CARB has provided to them and the figures presented in the May 8 Staff Report. The gaps (discussed in section IV, below) are representative of the types of discrepancies and lack of support for AB 32 expenses that the Associations have observed in the records available to them.

### III. THE PENDING PUBLIC RECORDS ACT LITIGATION IN SACRAMENTO SUPERIOR COURT

As a result of the dilatory production of documents under the Associations' CPRA requests, an action was filed on May 7, 2009 to obtain access to the documents withheld by CARB relating to the **basis** for the **amount** of the proposed fee and the **nexus** with the regulatory activity to be funded by the proposed fee under Health & Safety Code § 38597. The CPRA authorizes injunctive and declarative relief, and a writ of mandate, to enforce the public's right to inspect or receive a copy of public records, with an expedited procedure for the court to issue a decision "at the earliest possible time." The Associations sought an alternate writ of mandate requiring CARB to show cause how the 11,981 pages of materials withheld from the disclosures pursuant to the February 13 CPRA request were not subject to disclosure. The CPRA requires that "factual information" *must* be disclosed. The courts have held that the Legislature intended that "access to information concerning the conduct of the People's business is a fundamental and necessary right of every person in this state," and that any claims of privilege and exemption are to be narrowly construed. *Citizens for a Better Environment v. Dept. of Food and Agriculture* (1985) 171 Cal.App.3d 704, 711. Under Health & Safety Code §§ 38597 and 57001(a), CARB is subject to a fee accountability program, and AB 32 requires that funds collected are to be "solely for the direct costs incurred."

The Superior Court is in the process of issuing the alternative writ and scheduling an *in camera* review of the 11,981 pages of withheld material (79% of CARB's files through February 13, 2009). As noted elsewhere in this correspondence, CARB has improperly claimed that financial and factual information is privileged and exempt from disclosure. The Board should continue the 45-day comment period, as requested in section VI below, pending this review by the Court and disclosure of the appropriate sections of the 11,981 pages of material.

### IV. THE ASSOCIATIONS' COMMENTS

Summaries of CARB's costs for the past two fiscal years ("FY") are presented on pages 109-11 of the May 8 Staff Report in Table 3a, titled "AB 32 Position Information and Program

Costs for Program Summary, FY 2007-08” (updated 6/11/09 on the CARB website), and Table 4a, titled “AB 32 Position Information and Program Costs for Program Summary, FY 2008-09” (updated 5/27/09 on the CARB website). These tables purport to show the estimated expenses for implementation of AB 32 in FY 2007-08 and FY 2008-09. However, CARB staff has not provided the Associations with records that would explain the actual basis for these estimated numbers. In addition, CARB posted spreadsheets to its website on June 1, 2009 that report an allocation of direct staff expenditures among various AB 32 program elements and specific AB 32 regulations. These spreadsheets indicate that a significant percentage of CARB’s direct staff expenses for implementation of AB 32 are not related to regulation of the four fuels and two process emission categories on which the proposed AB 32 fee would be imposed. Further, the records staff has provided related to direct staff expenses raise serious questions about CARB staff’s accounting practices. In addition, the questionable basis for the accounting for past year expenses related to AB 32 calls into question the basis for any estimated future year budgets for AB 32 administration.

CARB staff claims that all expenses to be recaptured through this fee for past and future years will be based on Budget Change Proposals (“BCPs”) submitted to the Department of Finance by CARB and other agencies that are eligible for reimbursement through the proposed AB 32 fee. In responding to the Associations’ CPRA requests, CARB staff has provided many copies of BCPs for CARB and the other agencies that will be reimbursed or funded by the fee (including Cal/EPA, California Energy Commission, Integrated Waste Management Board, Department of Food and Agriculture, and General Services). While these reports provide some information on the types of work that the agencies plan on doing related to AB 32, they do not substantiate what expenditures were actually made in implementing AB 32. These BCPs also indicate a lack of nexus between the proposed fee payers, the four fuels and two process emission categories, and the activities being carried out by state agencies other than CARB to implement AB 32. Other records produced by CARB staff in response to the CPRA requests also indicate that there may be an overall lack of substantive support for actual expenditures in implementing AB 32.

For example, Table 3a of the May 8 Staff Report includes a subtotal of 125.44 PYs (person years), purportedly covering CARB staff working on AB 32 programs for FY 2007-08, and Table 4a includes a subtotal of 181.23 PYs, purportedly covering CARB staff working on AB 32 programs for FY 2008-09. The records provided the Associations by CARB staff indicate that CARB requested each of its divisions to provide spreadsheet information for each employee and percentage of time working on specific AB 32 programs. However, charts and spreadsheets provided to the Associations with reported PYs and percentages of time spent on AB 32 programs from individual divisions can account for only 57.44 PYs in FY 2007-08, and only 65.32 PYs in FY 2008-09. The estimated number of staff working on AB 32 programs, and the specific work done in implementing AB 32, is critical to proper implementation of CARB’s fee accountability program. With supporting data on more than half of the claimed PYs missing, the Associations’ ability to make meaningful comments on the proposed AB 32 Fee Regulation has been prejudiced.

Another area of significant data gaps is CARB staff's accounting for past and current year expenses related to the categories of "Operating Costs" included in Tables 3a and 4a of the May 8 Staff Report. CARB staff has divided Operating Costs into several sub-categories, including General Expenses, Printing, Communications, Postage, Training, Travel-in-State, and Facilities (rent). The only records that CARB staff has provided in response to the Associations' CPRA requests that contain supporting data for these types of costs is a California State Accounting and Reporting System ("CALSTARS") report of CARB "Expenditures by Program and Object as of 01/31/09." This report appears to cover the first seven months of FY 2008-2009, and contains cost information reported to the Department of Finance by CARB on a monthly basis. However, the expenses listed in the CALSTARS report do not support CARB's estimates for FY 2008-09. For example, the May 8 Staff Report lists estimated printing costs to be \$173,618 for FY 2008-09, yet the CALSTARS report only lists \$4,089 in printing-related expenses. The May 8 Staff Report also lists postage costs at \$181,230, yet the CALSTARS report contains no line item for postage expenses. Similar discrepancies exist for each of the sub-categories for Operating Costs in FY 2008-09. In addition, no CALSTARS Reports for FY 2007-08 were provided to the Associations in response to any of their CPRA requests. In total, these Operating Costs account for \$11,635,746 over the two-year period of FY 2007-08 and FY 2008-09 in Tables 3a and 4a, and are not substantiated by records thus far provided the Associations by CARB staff.

Similarly, expenses listed in the May 8 Staff Report Tables 3a and 4a for "Other Costs" are not supported by the records provided by CARB staff in response to any of the Associations' CPRA requests. These costs include equipment costs, which the May 8 Staff Report estimates to be \$1,830,564 for FY 2008-09. However, the CALSTARS report only includes \$63,955 in expenses that are attributed to equipment. While emails provided to the Associations in response to their CPRA requests indicate that CARB staff claims it has the "back-up" for the \$1,830,564 amount, CARB staff has not produced any such documentation. In total, equipment costs account for \$1,875,744 in expenses over the two-year period of FY 2007-08 and FY 2008-09 as set forth in Tables 3a and 4a, and are not substantiated by records thus far provided the Associations by CARB staff.

Any discussion of "Contract Costs" must come with the caveat that the Associations have had limited time to review specific material provided on June 19, 2009 related to Contract Costs. Little information on Contract Costs was released prior to that date. What can be observed, though, is that while CARB staff has released some charts and spreadsheets with certain data relating to contracts, and the contractors involved, it is difficult to correlate the estimated costs for each of FY 2007-08 and FY 2008-09 with the numbers in the records provided, because the furnished records often contain different totals for Contract Costs in FY 2007-08 and FY 2008-09 than does the May 8 Staff Report. In addition, no records were provided the Associations that substantiate that these contracts were actually filled, as no receipts or other documentation confirming contract expenses were provided. The only substantiation of actual expenditures, the CALSTARS report for FY 2008-09, only indicates that \$1,803,512 was spent on contracts in the first seven months of that FY, while the May 8 Staff Report lists \$5,900,000 as the total for FY 2008-09 contracts. In total, Contract Costs account for \$10,552,429 in expenses over the two-

year period of FY 2007-08 and FY 2008-09 as set forth in Tables 3a and 4a, and are not substantiated by records thus far provided the Associations by CARB staff.

Another category of costs for which CARB staff has offered no supporting documentation includes expenses for "Administrative Overhead." According to the May 8 Staff Report, CARB staff estimates that these costs were \$1,998,872 in FY 2007-08, and \$ 1,961,069 in FY 2008-09. CARB staff states that "[t]o calculate this cost, ARB determined that approximately 13 percent of our program-related positions are budgeted as climate change positions. Staff then attributed 13 percent of the total cost of the Chairman's Office, the Executive Office, administrative services and computer services to the climate change program." May 8 Staff Report, p. 107. CARB staff has not provided the Associations with any records supporting a determination that 13-percent of all CARB activities are climate change-related, nor has staff provided any records that support attributing 13-percent of administrative services to climate change based on such a conclusion. This approach is objectionable based on the lack of any substantial evidence that any of these administrative activities are related to AB 32 activities. In total, administrative overhead accounts for \$ 3,959,941 in expenses over the two-year period of FY 2007-08 and FY 2008-09 as set forth in Tables 3a and 4a, and is not substantiated by records thus far provided the Associations by CARB staff.

Overall, the amount of Operating Costs, Other Costs, and Administrative Overhead that is unsubstantiated totals \$28,023,860 over the two-year period of FY 2007-08 and FY 2008-09. This is more than 43% of the combined total estimated AB 32 expenditures in the May 8 Staff Report over that same two-year period. It is unconceivable that CARB could responsibly adopt the proposed AB 32 Fee Regulation when such a large percentage of the proposed fee amount would be collected for wholly unsubstantiated costs.

As stated above, a major hurdle preventing the Associations from making meaningful comments on the proposed AB 32 Fee Regulation has been the ongoing foot dragging by CARB staff and its refusal to timely provide them with the public records to which they are lawfully entitled. Add to this the extraordinary number of pages of records that CARB staff is withholding under claim of various privileges. This is especially troubling given the inappropriate manner in which it is clear that CARB staff has been applying these privileges. As just one example, on May 27, 2009, CARB staff provided documents to the Associations in response to the February 13 CPRA request that included headers reading "Attorney-Client Confidential Work Product." (See Attachment B, appended hereto). These records were spreadsheets with estimates of staff hours and percentages of time spent on AB 32-related work (later posted on CARB's website as noted above), and would not qualify as attorney-client privilege given the factual content of these spreadsheets. In fact, CARB staff has since admitted that these headers were a mistake, and that there was no privilege attached to these documents. Likewise, in the most recent release of records on June 19, 2009, CARB provided a document with the same header, "Attorney-Client Confidential Work Product." This document contained estimates of "Climate Change Staffing Resources for FY 2007-08 and FY 2008-09," and due to the factual nature of the information, could not be considered privileged. (See Attachment C, appended hereto). These examples indicate that it is highly likely that CARB is misapplying applicable privileges, and is possibly unlawfully withholding thousands of pages of public records related to the proposed AB 32 Fee Regulation. In the interest of open government and

full transparency, CARB staff should disclose all responsive documents to the Associations prior to any action the Board may take, and thereby allow the public to have a full and fair opportunity to comment on the proposed AB 32 Fee Regulation.

In addition to the above comments related to data gaps in CARB's expenditures to date, the limited information that has been provided demonstrates that there are significant expenses being claimed that are not in fact AB 32 expenses, as well as significant expenditures that lack any nexus with the proposed fees and fee payers.

In the first category, the Associations have preliminarily identified direct staff expenses, using the aforementioned direct staff expense spreadsheet for FY 2008-2009 posted to CARB's website (*See Attachment B*), which are related to the Western Climate Initiative ("WCI") in the amount of \$556,620.79, amounting to 3.46% of direct staff costs for the current fiscal year. WCI is not an AB 32 activity, and the Associations reserve the right to further challenge the ability of CARB to recover past or future expenses related to WCI through the AB 32 administrative fee. It appears that some of the claimed contract expenses also relate to WCI, and the Associations reserve the right to further comment as they are able to further analyze the information provided on June 19. Further analysis may result in the identification of further staff costs that are related to WCI or to other general climate change work, such as the Climate Action Team and other activities, which are not "direct costs incurred" for administration of AB 32.

In the second category—of AB 32 implementation costs that lack a nexus with the proposed fees—the Associations would call CARB's attention to the following percentages, again based upon the posted spreadsheet of direct staff costs for FY 2008-2009, of overall staff time spent on AB 32 activities that directly regulate or otherwise address emissions that are not related to the four fuels and two process emissions categories:

Forestry	.99%	
Glass	.69%	
Protocol Development	1.43%	
Small business assistance	.70%	
High GWP gases	10.62%	
Landfills	1.85%	
<u>Landuse Planning</u>	<u>2.36%</u>	
Subtotal		18.64%

An additional set of expenditures whose nexus with the proposed fee payers is questionable include a group of goods movement and transportation related measures:

Goods Movement:	1.56%	
Cool Cars:	1.14%	
Smartway:	4.34%	
Shorepower:	.42%	
<u>Tire Pressure:</u>	<u>1.62%</u>	
Subtotal:		9.08%

There is an additional category of expenses that the Associations have been given to understand, based upon statements of CARB staff, would not be funded using the AB 32 administrative fee. These include:

Pavley:	1.56%	
<u>Electricity Programs:</u>	<u>2.14%</u>	
Subtotal:		3.70%

The grand total of the percentage of these expenditures is 34.88%. Applied to the direct staff expenses and benefits figures provided in Table 4a for FY 2008-2009, the total related expense is \$7,577,199.70.

Finally, based upon review of the limited information provided by CARB staff on the activities of other agencies in implementing AB 32, it does not appear that any of the activities proposed to be funded have a proper nexus with the four fuels and two process emissions on which the proposed fee would be imposed. These expenses are estimated to make up \$3.1 million for FY 2009-2020, or 8.6% of the total annual revenue going forward.

The Associations, as noted in connection with CARB staff's limited and untimely response to requests for public records, have had limited information and time on which to develop the above analysis, and reserve the right to further comment on the subjects of expenses which are not related to AB 32, and AB 32 expenses which are not related to the four fuels and two process emissions on which the proposed fee would be imposed. These further comments may address direct staff costs further, and may also address other categories of expense, including but not limited to contracts and equipment.

**V. THE FIFTEEN-DAY COMMENT PERIOD UNDER GOVT. CODE SECTION 11346.8 IS NOT AN ADEQUATE SUBSTITUTE FOR THE PROPER CONSIDERATION OF COMMENTS DURING THE 45-DAY COMMENT PERIOD REQUIRED PRIOR TO BOARD ACTION**

It is possible that CARB staff may argue that the 45-day comment period should close on June 24, 2009 and that the 15-day comment period under Govt. Code § 11346.8 would be a substitute for the proper submission and consideration of comments by the full Board. However, the subsequent 15-day comment period is strictly limited. Under § 11346.8(c), CARB may not amend the proposed regulation unless the change is "non-substantial or solely grammatical in nature" or "sufficiently related to the original text" that the public is on notice from the outset of any change to originally proposed regulatory action. This is not the case concerning the substantial data gaps and nexus issues as set forth above. Accordingly, the Board should extend the 45-day comment period for at least one additional public hearing to allow for the very substantial issues concerning the data gaps and withheld documents to be resolved, and to afford a proper amount of time for preparation and submission of comments.

**VI. REQUEST FOR CONTINUATION OF THE 45-DAY COMMENT PERIOD**

The Associations respectfully request the Board to defer final action on adoption of the proposed AB 32 Fee Regulation to the July 23 Agenda, with the comment period to remain open through July 22, 2009. As noted above, there are substantial questions concerning the accuracy and verification of calculations affecting a very sizable fraction of the proposed fee. The Court is considering the 11,981 pages of withheld materials in an *in camera* review, which may raise additional issues concerning the accuracy of the information presently before the Board. The Associations have been unfairly prejudiced by the withheld material, untimeliness of material that has been produced, and inadequate time to prepare proper comments for consideration by the Board on this very important issue. The Board should exercise its discretion to allow additional time for comments.

\* \* \* \* \*

On behalf of the Associations, thank you for the opportunity to submit these comments. If you have any questions you can contact me at (916) 448-2162, or by email at [tfrancois@ka-pow.com](mailto:tfrancois@ka-pow.com).



Tony Francois

cc: James Goldstene, ARB  
Kevin Kennedy, ARB  
Edie Chang, ARB  
Jon Costantino, ARB  
Ellen Peter, Chief Counsel, ARB  
Robert Jenne, ARB  
Cindy Tuck, Cal/EPA  
Erika Frank, General Counsel, California Chamber of Commerce  
Michele Pielsticker, Vice President and General Counsel, California Taxpayers' Association  
Tony Francois, KP Public Affairs  
California Business Properties Association  
California Independent Oil Marketers Association  
California League of Food Processors  
California Manufacturers & Technology Association  
California Small Business Alliance  
Howard Jarvis Taxpayers Association  
National Federation of Independent Business – California  
The California Black Chamber of Commerce  
Western States Petroleum Association

# **ATTACHMENT A**

FABIAN NUÑEZ  
SPEAKER OF THE ASSEMBLY

LETTER TO THE JOURNAL

August 31, 2006

Mr. E. Dotson Wilson  
Chief Clerk of the Assembly  
State Capitol, Room 3196  
Sacramento, CA 95814

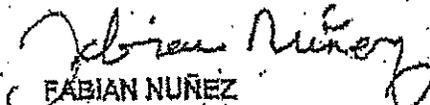
Dear Mr. Wilson:

I am submitting this letter to the Assembly Daily Journal regarding AB 32, the Global Warming Solutions Act of 2006.

AB 32 authorizes the California Air Resources Board to adopt a schedule of fees to pay for the direct costs of administering the reporting and emission reduction and compliance programs established pursuant to the bill's provisions.

It is my intent that any funds provided by Health and Safety Code Section 38597 are to be used solely for the direct costs incurred in administering this division. This intent is further demonstrated by the fact that Section 38597 is contained within Part 7 of the bill which relates to the California Air Resources Board's administrative functions.

Sincerely,

  
FABIAN NUÑEZ  
Speaker of the Assembly

# **ATTACHMENT B**

ATTORNEY-CLIENT CONFIDENTIAL WORK PRODUCT  
 These numbers represent ARBs best conservative estimate as of the date of this document. 5/27/2009

Air Resources Board  
 Climate Change Staffing Resources  
 FY 07/08

EMPLOYEE CLASSIFICATION	EMPLOYEE NAME	DIV	Employees	Monthly SALARY FY 2007/08	% FY 2007/08	ANNUAL ALLOCATED COST FY 2007-08	Program Start Date	Program End Date	First Program Area	Second Program Area	Third Program Area	Notes (Displayed to show 1st/2nd/3rd Program Area split, and if split is part time)
Air Pollution Spec		ED	1.0	\$7,214	1%	\$666	7/1/2007	6/30/2008	High GWP in CP			30
Air Pollution Spec		ED	1.0	\$7,214	33%	\$28,567	11/1/2007	6/30/2008	Protocol Development	Shore Power	non-AB 32	
Air Pollution Spec		ED	1.0	\$5,252	66%	\$41,956	11/1/2007	6/30/2008	HD Vehicles (smartways)	SF6 reductions	SF6 reductions	30/20/16
Air Pollution Spec		ED	1.0	\$5,964	90%	\$21,470	4/1/2008	6/30/2008	Cap and Trade Regulation			30
Air Resources Engr		ED	1.0	\$7,214	68%	\$57,135	11/1/2007	6/30/2008	High GWP in CP	Landfill Methane	Cement	30/30/6
Air Resources Supvr I		ED	1.0	\$8,965	10%	\$10,758	7/1/2007	6/30/2008	LCFS			
Air Resources Supvr I		ED	1.0	\$8,965	3%	\$3,207	7/1/2007	6/30/2008	High GWP in CP			
Air Resources Supvr I		ED	1.0	\$8,965	68%	\$71,003	11/1/2007	6/30/2008	various			
Air Resources Supvr I		ED	1.0	\$8,965	50%	\$5,790	7/1/2007	6/30/2008	various			
Air Resources Supvr I		ED	1.0	\$8,965	1%	\$1,076	7/1/2007	6/30/2008	High GWP in CP			
Air Resources Supvr II		ED	1.0	\$9,842	18%	\$21,259	7/1/2007	6/30/2008	HD Vehicles			
Air Resources Supvr II		ED	1.0	\$9,842	5%	\$5,905	7/1/2007	6/30/2008	various			
Staff Air Pollution Spec		ED	1.0	\$8,249	55%	\$54,443	7/1/2007	6/30/2008	Protocol Development	LCFS	Mandatory Reporting	30/15/10
Staff Air Pollution Spec		ED	1.0	\$8,249	5%	\$4,949	7/1/2007	6/30/2008	various			
Air Pollution Spec		EO (OCO)	1.0	\$4,674	83%	\$46,553	8/31/2007	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$7,214	17%	\$14,717	5/1/2008	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$6,729	42%	\$33,914	2/1/2008	6/30/2008	Scoping Plan	Oil and Gas Extraction		
Air Pollution Spec		EO (OCO)	1.0	\$6,904	75%	\$62,136	10/1/2007	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$5,940	8%	\$5,702	6/25/2008	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$6,724	56%	\$46,799	12/20/2007	6/30/2008	Scoping Plan	Electricity programs (efficiency/CHP/RPS)		
Air Pollution Spec		EO (OCO)	1.0	\$9,893	75%	\$35,127	10/24/2007	6/30/2008	Scoping Plan	High GWP in CP		
Air Pollution Spec		EO (OCO)	1.0	\$8,871	100%	\$82,452	7/1/2007	6/30/2008	Scoping Plan	Forest Accounting		
Air Pollution Spec		EO (OCO)	1.0	\$5,997	83%	\$39,730	9/29/2007	6/30/2008	Scoping Plan	Green Buildings		
Air Pollution Spec		EO (OCO)	1.0	\$4,674	8%	\$4,487	6/25/2008	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$6,909	83%	\$68,814	9/29/2007	6/30/2008	Scoping Plan	HD Vehicles (smartways)		
Air Pollution Spec		EO (OCO)	1.0	\$6,875	83%	\$68,475	9/25/2007	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$7,214	17%	\$14,717	2/25/2008	4/6/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$7,214	25%	\$21,642	4/1/2008	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$6,875	66%	\$54,450	10/5/2007	6/30/2008	Scoping Plan	Oil and Gas Transmission		
Air Pollution Spec		EO (OCO)	1.0	\$7,214	83%	\$71,851	10/9/2007	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$7,214	9%	\$7,791	10/26/2007	10/26/2007	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$7,083	56%	\$49,298	11/30/2007	7/7/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$6,904	25%	\$20,712	4/10/2008	6/30/2008	Scoping Plan	WCI		
Air Pollution Spec		EO (OCO)	1.0	\$9,893	42%	\$19,671	2/25/2008	6/30/2008	Scoping Plan	WCI		
Air Resources Engr		EO (OCO)	1.0	\$6,270	50%	\$37,620	1/3/2008	10/3/2008	Scoping Plan	WCI		
Air Resources Engr		EO (OCO)	1.0	\$4,899	58%	\$34,097	12/14/2007	6/30/2008	Scoping Plan	WCI		
Air Resources Supvr I		EO (OCO)	1.0	\$7,854	93%	\$87,812	8/6/2007	6/30/2008	Scoping Plan	Protocol Development		
Air Resources Supvr I		EO (OCO)	1.0	\$7,214	32%	\$20,567	3/24/2008	6/30/2008	Scoping Plan			
Air Resources Supvr I		EO (OCO)	1.0	\$6,769	92%	\$65,816	7/1/2007	6/30/2008	Scoping Plan	WCI		
Air Resources Supvr I		EO (OCO)	1.0	\$8,861	100%	\$103,932	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supvr I		EO (OCO)	1.0	\$9,842	100%	\$118,704	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supvr II		EO (OCO)	1.0	\$8,097	92%	\$89,391	8/6/2007	6/30/2008	Scoping Plan			
Assoc Govt Prog Analyst		EO (OCO)	1.0	\$4,669	100%	\$56,268	7/1/2007	6/30/2008	Scoping Plan			
C.E.A.		EO (OCO)	1.0	\$11,959	25%	\$35,907	7/1/2007	6/30/2008	Scoping Plan			
C.E.A.		EO (OCO)	1.0	\$10,456	100%	\$125,472	7/1/2007	6/30/2008	Scoping Plan			
Environmental Program Manager I		EO (OCO)	1.0	\$7,575	25%	\$22,725	3/1/2008	6/4/2008	Scoping Plan			
Exec Asst		EO (OCO)	1.0	\$2,686	50%	\$16,116	8/1/2007	6/30/2008	Scoping Plan			
Exec Asst		EO (OCO)	1.0	\$2,686	56%	\$22,884	12/24/2007	6/30/2008	Scoping Plan	WCI		
Office Tech-Typing		EO (OCO)	1.0	\$2,686	17%	\$5,479	5/5/2008	6/30/2008	Scoping Plan			
Staff Air Pollution Spec		EO (OCO)	1.0	\$8,249	100%	\$98,948	7/1/2007	6/30/2008	Scoping Plan			
Staff Services Analyst-Gen		EO (OCO)	1.0	\$3,599	100%	\$43,188	7/1/2007	6/30/2008	Scoping Plan			
Air Pollution Spec		MILD	1.0	\$7,214	100%	\$86,968	7/1/2007	6/30/2008	Research/Science activities			
Air Pollution Spec		MILD	1.0	\$7,214	50%	\$43,284	7/1/2007	12/31/2007	Research/Science activities			
Air Pollution Spec		MILD	1.0	\$7,214	50%	\$43,284	7/1/2007	6/30/2008	Research/Science activities			
Air Resources Engr		MILD	1.0	\$7,214	10%	\$8,657	11/2008	6/30/2008	Research/Science activities			
Air Resources Engr		MILD	1.0	\$7,214	30%	\$25,970	7/1/2007	6/30/2008	Research/Science activities			Lab Support for LCFS
Air Resources Supvr I		MILD	1.0	\$8,965	5%	\$5,378	7/1/2007	6/30/2008	Research/Science activities			Ambient Air Analyses
Air Resources Supvr I		MILD	1.0	\$8,965	25%	\$26,895	7/1/2007	6/30/2008	Research/Science activities			Lab Support for LCFS & P2Tox
Instrument Techn		MILD	1.0	\$4,966	20%	\$11,966	1/1/2008	6/30/2008	Research/Science activities	GHG inventory		GHG Air Monitoring
Staff Air Pollution Spec		MILD	1.0	\$8,249	25%	\$24,747	7/1/2007	6/30/2008	GHG inventory			Lab Support for GHG Inventory

Air Resources Board  
 Climate Change Staffing Resources  
 FY 07/08

EMPLOYEE CLASSIFICATION	EMPLOYEE NAME	Div*	Employees	Monthly SALARY FY 2007-08	% FY 2007-08	ANNUAL ALLOCATED COST FY 2007-08	Program Start Date	Program End Date	First Program Area	Second Program Area	Third Program Area	Notes (Displayed to show 1st/2nd/3rd Program Area only, and if staff is part time)
Air Pollution Spec		MSCD	1.0	\$5,410	15%	\$9,738	10/9/2007	6/30/2008	Scoping Plan	Early Action Board Item (SmartWay)		20% of time for 8 months. Time base 75%.
Air Pollution Spec		MSCD	1.0	\$7,064	50%	\$42,384	7/1/2007	6/30/2008	Early Action Board Item (SmartWay)			100% of her time for 1 month
Air Pollution Spec		MSCD	1.0	\$5,997	8%	\$5,757	5/14/2008	6/30/2008	Early Action Board Item (SmartWay)			75% of time for 3 months
Air Pollution Spec		MSCD	1.0	\$7,214	19%	\$16,446	3/6/2008	6/30/2008	HD Vehicles (smartways)	Scoping Plan		60/25
Air Resources Engr		MSCD	1.0	\$7,617	85%	\$7,893	7/1/2007	6/30/2008	Early Action Board Item (SmartWay)			100% of time for 4 months
Air Resources Engr		MSCD	1.0	\$7,214	25%	\$21,642	3/6/2008	6/30/2008	Early Action Board Item (SmartWay)			
Air Resources Engr		MSCD	1.0	\$7,617	20%	\$18,281	7/1/2007	6/30/2008	Early Action Board Item (SmartWay)			
Air Resources Supvr I		MSCD	1.0	\$8,955	55%	\$59,169	7/1/2007	6/30/2008	Early Action Board Item (SmartWay)			
Air Resources Supvr I		MSCD	1.0	\$8,138	50%	\$48,825	7/1/2007	6/30/2008	Scoping Plan	Early Action Board Item (SmartWay)		26/25
Air Resources Supvr I		MSCD	1.0	\$8,551	70%	\$71,827	7/1/2007	6/30/2008	Early Action Board Item (SmartWay)			
Air Resources Supvr II		MSCD	1.0	\$9,842	30%	\$35,431	7/1/2007	6/30/2008	Scoping Plan	Early Action Board Item (SmartWay)	Early Action Board Item (Solar-Reflective Paints/Windows)	20/5/5
Asst Div Chief		MSCD	1.0	\$10,339	45%	\$55,331	7/1/2007	6/30/2008	Scoping Plan			10/5/2005
C.E.A.		MSCD	1.0	\$10,866	20%	\$26,054	7/1/2007	6/30/2008	Scoping Plan	Pavley		
Staff Air Pollution Spec		MSCD	1.0	\$4,125	50%	\$24,747	7/1/2007	6/30/2008	Early Action Board Item (Solar-Reflective Paints/Windows)			worked entire time on GHG but is a 50% time-base employee
Staff Air Pollution Spec		MSCD	1.0	\$8,249	60%	\$59,393	7/1/2007	6/30/2008	Early Action Board Item (SmartWay)			100% of time for 7 months
Air Pollution Spec		MSCD	1.0	\$7,089	90%	\$76,561	7/1/2007	6/30/2008	various			
Air Pollution Spec		MSCD	1.0	\$4,328	5%	\$4,328	7/1/2007	6/30/2008	Early Action Board Item			
Air Resources Engr		MSCD	1.0	\$5,680	10%	\$5,618	7/1/2007	6/30/2008	LOFS			
Air Resources Engr		MSCD	1.0	\$7,214	10%	\$9,140	7/1/2007	6/30/2008	LOFS			
Air Resources Engr		MSCD	1.0	\$8,955	1%	\$8,957	7/1/2007	6/30/2008	various			
Air Resources Supvr I		MSCD	1.0	\$9,842	1%	\$1,181	7/1/2007	6/30/2008	various			
Air Resources Supvr II		MSCD	1.0	\$9,842	5%	\$5,305	7/1/2007	6/30/2008	various			
Air Resources Supvr II		MSCD	1.0	\$3,416	15%	\$6,148	7/1/2007	6/30/2008	GHG Inventory			
Auto Emission Test Spec II		MSCD	1.0	\$3,841	15%	\$6,314	7/1/2007	6/30/2008	GHG Inventory			
Auto Emission Test Spec III		MSCD	1.0	\$4,328	33%	\$17,146	7/1/2007	6/30/2008	GHG Inventory			
Auto Emission Test Spec III		MSCD	1.0	\$4,544	33%	\$17,984	7/1/2007	6/30/2008	GHG Inventory			
Staff Air Pollution Spec		MSCD	1.0	\$8,249	5%	\$4,948	7/1/2007	6/30/2008	various			
Air Pollution Spec		PTSD	1.0	\$7,214	10%	\$8,657	7/1/2007	6/30/2008	GHG Inventory			10
Air Pollution Spec		PTSD	1.0	\$5,940	25%	\$21,643	7/1/2007	6/30/2008	GHG Inventory			25
Air Pollution Spec		PTSD	1.0	\$6,493	5%	\$3,993	7/1/2007	6/30/2008	GHG Inventory			5
Air Pollution Spec		PTSD	1.0	\$6,237	75%	\$56,133	7/1/2007	6/30/2008	GHG Inventory			45/30
Air Pollution Spec		PTSD	1.0	\$7,214	10%	\$8,657	7/1/2007	6/30/2008	Mandatory Reporting	Protocol Development		10
Air Pollution Spec		PTSD	1.0	\$6,907	50%	\$41,442	7/1/2007	6/30/2008	Mandatory Reporting	Protocol Development		50/25/25
Air Pollution Spec		PTSD	1.0	\$5,110	60%	\$35,792	7/1/2007	6/30/2008	Protocol Development	Land Use Planning		18/45
Air Pollution Spec		PTSD	1.0	\$7,214	50%	\$43,284	7/1/2007	6/30/2008	GHG Inventory	Mandatory Reporting		25/25
Air Pollution Spec		PTSD	1.0	\$5,940	10%	\$7,128	7/1/2008	6/30/2008	GHG Inventory			10
Air Pollution Spec		PTSD	1.0	\$6,237	75%	\$56,133	7/1/2007	6/30/2008	Protocol Development	Scoping Plan		37/37
Air Pollution Spec		PTSD	1.0	\$5,924	33%	\$23,460	7/1/2007	6/30/2008	GHG Inventory	Protocol Development		75/20/5
Air Pollution Spec		PTSD	1.0	\$5,712	25%	\$17,136	4/1/2008	6/30/2008	Mandatory Reporting	Protocol Development	WCI	25
Air Pollution Spec		PTSD	1.0	\$4,980	100%	\$59,875	7/1/2007	6/30/2008	Scoping Plan	Forest Accounting	Protocol Development	50/25/25
Air Pollution Spec		PTSD	1.0	\$3,903	25%	\$11,708	7/1/2007	6/30/2008	GHG Inventory			25%
Air Pollution Spec		PTSD	1.0	\$6,549	75%	\$58,941	7/1/2007	6/30/2008	GHG Inventory	Land Use Planning		37/37
Air Pollution Spec		PTSD	1.0	\$5,416	100%	\$66,668	7/1/2007	6/30/2008	Mandatory Reporting	Protocol Development		75/20/5
Air Pollution Spec		PTSD	1.0	\$5,416	100%	\$7,128	7/1/2007	6/30/2008	GHG Inventory			10
Air Pollution Spec		PTSD	1.0	\$5,778	100%	\$45,338	7/1/2007	6/30/2008	Forest Accounting			10
Air Pollution Spec		PTSD	1.0	\$6,724	10%	\$5,069	7/1/2008	6/30/2008	Scoping Plan			85
Air Pollution Spec		PTSD	1.0	\$5,455	85%	\$73,387	7/1/2007	6/30/2008	GHG Inventory			100
Air Resources Engr		PTSD	1.0	\$6,012	100%	\$72,144	7/1/2007	6/30/2008	Mandatory Reporting			25
Air Resources Engr		PTSD	1.0	\$6,237	25%	\$18,711	7/1/2007	6/30/2008	GHG Inventory			30
Air Resources Engr		PTSD	1.0	\$5,050	30%	\$18,179	7/1/2007	6/30/2008	GHG Inventory			5
Air Resources Engr		PTSD	1.0	\$7,214	5%	\$4,328	7/1/2007	6/30/2008	GHG Inventory			20
Air Resources Engr		PTSD	1.0	\$7,617	20%	\$16,281	7/1/2007	6/30/2008	GHG Inventory			15
Air Resources Engr		PTSD	1.0	\$6,549	15%	\$11,788	7/1/2007	6/30/2008	GHG Inventory			

Air Resources Board  
 Climate Change Staffing Resources  
 FY 07/08

EMPLOYEE CLASSIFICATION	EMPLOYEE NAME	DIV	Employee	Monthly SALARY FY 2007-08	% FY 2007-08	ANNUAL ALLOCATED COST FY 2007-08	Program Start Date	Program End Date	First Program Area	Second Program Area	Third Program Area	Notes (Displayed to show list of 100 Program Areas split, and if staff is part time)
Air Resources Engr		PTSD	1.0	\$6,237	15%	\$11,227	7/1/2007	6/30/2008	GHG Inventory			15
Air Resources Engr		PTSD	1.0	\$6,214	40%	\$28,828	2/1/2008	6/30/2008	Mandatory Reporting			40
Air Resources Engr		PTSD	1.0	\$6,214	58%	\$43,639	12/1/2007	6/30/2008	Mandatory Reporting	Protocol Development		50/10
Air Resources Engr		PTSD	1.0	\$5,910	15%	\$10,645	2/1/2008	6/30/2008	GHG Inventory			15
Air Resources Engr		PTSD	1.0	\$7,214	30%	\$28,970	7/1/2007	6/30/2008	GHG Inventory			30
Air Resources Engr		PTSD	1.0	\$6,549	50%	\$39,204	7/1/2007	6/30/2008	GHG Inventory			50
Air Resources Engr		PTSD	1.0	\$8,965	5%	\$5,376	7/1/2007	6/30/2008	GHG Inventory			5
Air Resources Engr		PTSD	1.0	\$8,913	10%	\$10,578	7/1/2007	6/30/2008	GHG Inventory			10
Air Resources Engr		PTSD	1.0	\$8,965	50%	\$35,791	7/1/2007	6/30/2008	GHG Inventory			50
Air Resources Engr		PTSD	1.0	\$8,965	100%	\$107,390	7/1/2007	6/30/2008	GHG Inventory			100
Air Resources Engr		PTSD	1.0	\$8,965	100%	\$107,390	7/1/2007	6/30/2008	GHG Inventory			100
Air Resources Engr		PTSD	1.0	\$8,965	100%	\$107,390	7/1/2007	6/30/2008	GHG Inventory			100
Air Resources Engr		PTSD	1.0	\$9,842	10%	\$11,810	7/1/2007	6/30/2008	Mandatory Reporting			10
Air Resources Engr		PTSD	1.0	\$9,842	75%	\$68,578	7/1/2007	6/30/2008	GHG Inventory			75
Air Resources Engr		PTSD	1.0	\$9,842	45%	\$55,147	7/1/2007	6/30/2008	GHG Inventory			45
Air Resources Engr		PTSD	1.0	\$10,856	60%	\$78,163	7/1/2007	6/30/2008	GHG Inventory			60
Air Resources Engr		PTSD	1.0	\$8,249	100%	\$39,988	7/1/2007	6/30/2008	Mandatory Reporting			100
Air Resources Engr		PTSD	1.0	\$7,617	100%	\$91,404	7/1/2007	6/30/2008	GHG Inventory			100
Air Resources Engr		PTSD	1.0	\$8,249	35%	\$34,646	7/1/2007	6/30/2008	GHG Inventory			35
Air Resources Engr		PTSD	1.0	\$8,249	75%	\$74,241	7/1/2007	6/30/2008	GHG Inventory			75
Air Resources Engr		PTSD	1.0	\$8,054	20%	\$19,330	7/1/2007	6/30/2008	GHG Inventory			20
Air Resources Engr		RD	1.0	\$6,774	20%	\$18,259	12/1/2007	6/30/2008	GHG Inventory			20
Air Resources Engr		RD	1.0	\$7,214	10%	\$8,657	7/1/2007	6/30/2008	Research/Science activities			10
Air Resources Engr		RD	1.0	\$6,752	30%	\$24,307	7/1/2007	6/30/2008	Scoping Plan			30
Air Resources Engr		RD	1.0	\$7,214	100%	\$86,568	7/1/2007	6/30/2008	Refrigerant Management			100
Air Resources Engr		RD	1.0	\$4,908	30%	\$17,669	7/1/2007	6/30/2008	Research/Science activities			30
Air Resources Engr		RD	1.0	\$3,903	70%	\$32,785	7/1/2007	6/30/2008	Small business assistance			70
Air Resources Engr		RD	1.0	\$5,940	42%	\$29,998	2/1/2008	6/30/2008	Other High GWP Programs			42
Air Resources Engr		RD	1.0	\$5,884	58%	\$40,959	7/1/2007	1/30/2008	Refrigerant Management			58
Air Resources Engr		RD	1.0	\$5,997	60%	\$43,178	12/1/2007	6/30/2008	Refrigerant Management	Other High GWP Programs		60
Air Resources Engr		RD	1.0	\$7,314	1%	\$878	7/1/2007	6/30/2008	Research/Science activities			1
Air Resources Engr		RD	1.0	\$6,615	90%	\$71,442	7/1/2007	6/30/2008	Research/Science activities			90
Air Resources Engr		RD	1.0	\$6,548	100%	\$76,576	7/1/2007	6/30/2008	GHG Inventory			100
Air Resources Engr		RD	1.0	\$6,549	95%	\$74,659	7/1/2007	6/30/2008	GHG Inventory			95
Air Resources Engr		RD	1.0	\$7,214	80%	\$99,254	7/1/2007	6/30/2008	Scoping Plan			80
Air Resources Engr		RD	1.0	\$6,871	100%	\$92,452	7/1/2007	6/30/2008	Scoping Plan			100
Air Resources Engr		RD	1.0	\$7,214	25%	\$21,642	7/1/2007	6/30/2008	GHG Inventory			25
Air Resources Engr		RD	1.0	\$6,549	35%	\$64,152	7/1/2007	6/30/2008	Research/Science activities			35
Air Resources Engr		RD	1.0	\$5,940	90%	\$32,745	2/1/2008	6/30/2008	Scoping Plan			90
Air Resources Engr		RD	1.0	\$6,497	42%	\$76,777	8/1/2007	6/30/2008	Small business assistance			42
Air Resources Engr		RD	1.0	\$7,214	91%	\$28,044	1/1/2008	6/30/2008	Scoping Plan			91
Air Resources Engr		RD	1.0	\$4,674	50%	\$28,567	3/1/2008	6/30/2008	Other High GWP Programs			50
Air Resources Engr		RD	1.0	\$4,908	100%	\$58,896	7/1/2007	6/30/2008	Refrigerant Management			100
Air Resources Engr		RD	1.0	\$6,774	20%	\$18,265	7/1/2007	6/30/2008	Research/Science activities			20
Air Resources Engr		RD	1.0	\$8,597	10%	\$10,316	7/1/2007	6/30/2008	Research/Science activities			10
Air Resources Engr		RD	1.0	\$7,214	5%	\$4,328	7/1/2007	6/30/2008	Research/Science activities			5
Air Resources Engr		RD	1.0	\$6,237	70%	\$52,391	7/1/2007	6/30/2008	Mobile AC			70

Air Resources Board  
 Climate Change Staffing Resources  
 FY 07/08

EMPLOYEE CLASSIFICATION	EMPLOYEE NAME	DIV	Employees	Monthly SALARY FY 2007-08	% FY 2007-08	ANNUAL ALLOCATED COST FY 2007-08	Program Start Date	Program End Date	First Program Area	Second Program Area	Third Program Area	Notes (Displayed to show 15/2nd/3rd Program Area split, and if staff's part time)
Air Resources Engr		RD	1.0	\$7,617	65%	\$59,413	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Engr		RD	1.0	\$7,214	58%	\$50,208	12/1/2007	6/30/2008	Mobile A/C	Research/Science activities	Other High GWP Programs	50/44 In this case, mobile AC is primarily referring to the small can regulatory item
Air Resources Engr		RD	1.0	\$7,214	60%	\$51,941	10/1/2007	6/30/2008	Research/Science activities			
Air Resources Engr		RD	1.0	\$7,617	90%	\$62,264	7/1/2007	6/30/2008	Mobile A/C	Other High GWP Programs		70/20 In this case, mobile AC is primarily referring to the small can regulatory item
Air Resources Supvr I		RD	1.0	\$8,965	50%	\$53,790	7/1/2007	6/30/2008	Scoping Plan	Research/Science activities	Early Action Board Item	
Air Resources Supvr I		RD	1.0	\$7,575	58%	\$52,722	12/1/2007	6/30/2008	Refrigerant Management	Other High GWP Programs	Scoping Plan	40/50/5
Air Resources Supvr I		RD	1.0	\$7,575	40%	\$36,360	7/1/2007	6/30/2008	Scoping Plan	SF6 reductions	Research/Science activities	
Air Resources Supvr I		RD	1.0	\$7,397	70%	\$52,051	7/1/2007	6/30/2008	Mobile A/C	Early Action Board Item	Scoping Plan	42/14/14
Air Resources Supvr I		RD	1.0	\$8,965	1%	\$1,076	7/1/2007	6/30/2008	Research/Science activities	Green buildings		
Air Resources Supvr I		RD	1.0	\$8,965	70%	\$75,306	7/1/2007	6/30/2008	Scoping Plan	Research/Science activities	High GWP in CP	30/30/10
Air Resources Supvr I		RD	1.0	\$8,965	60%	\$64,548	7/1/2007	6/30/2008	Research/Science activities	GHG Inventory	Research/Science activities	40/20 In this case, inventory refers to emissions verification studies
Air Resources Supvr I		RD	1.0	\$7,766	80%	\$74,554	7/1/2007	6/30/2008	Small business assistance	Scoping Plan		40/30/10
Air Resources Supvr I		RD	1.0	\$7,125	16%	\$13,650	7/1/2007	9/1/2007	Early Action Board Item			
Air Resources Supvr II		RD	1.0	\$9,413	50%	\$56,476	10/1/2007	6/30/2008	Refrigerant Management	Scoping Plan	Research/Science activities	
Air Resources Supvr II		RD	1.0	\$9,842	70%	\$82,673	7/1/2007	6/30/2008	Scoping Plan	Mobile A/C	Early Action Board Item	30% RM, 15% SP, 5% science
Air Resources Supvr II		RD	1.0	\$9,413	60%	\$67,774	7/1/2007	6/30/2008	GHG Inventory	SF6 reductions	Scoping Plan	30/30/10 In this case, mobile AC is primarily referring to the small can regulatory item
Air Resources Supvr II		RD	1.0	\$9,842	1%	\$1,181	7/1/2007	6/30/2008	Research/Science activities	Scoping Plan	Green buildings	
Assoc Govt Prog Analyst		RD	1.0	\$5,348	30%	\$19,253	7/1/2007	6/30/2008	CC Related Admin. Support	Scoping Plan		
Assoc Govt Prog Analyst		RD	1.0	\$4,278	25%	\$12,895	7/1/2007	6/30/2008	CC Related Admin. Support			
Assoc Info Systems Analyst-Spec		RD	1.0	\$5,403	3%	\$1,945	7/1/2007	6/30/2008	CC Related Library Support			
Asst Div Chief		RD	1.0	\$10,334	70%	\$66,806	7/1/2007	6/30/2008	Mobile A/C	Scoping Plan	Early Action Board Item	30/25/15
C.E.A.		RD	1.0	\$10,856	40%	\$52,109	7/1/2007	6/30/2008	State Agency Coordination	GHG Inventory	Scoping Plan	15/15/10
Library Tech Asst I		RD	1.0	\$2,695	2%	\$647	7/1/2007	6/30/2008	CC Related Library Support			
Office Techn-Typing		RD	1.0	\$2,820	25%	\$6,460	10/1/2007	6/30/2008	CC Related Admin. Support			
Office Techn-Typing		RD	1.0	\$3,125	30%	\$11,250	7/1/2007	6/30/2008	CC Related Admin. Support			
Special Consultant		RD	1.0	\$4,219	16%	\$8,100	5/1/2008	6/30/2008	Mobile A/C	Scoping Plan	Other High GWP Programs	
Staff Air Pollution Spec		RD	1.0	\$8,249	50%	\$49,494	7/1/2007	6/30/2008	Mobile A/C	Scoping Plan	Research/Science activities	25/15/10
Staff Air Pollution Spec		RD	1.0	\$8,249	10%	\$9,899	7/1/2007	6/30/2008	Research/Science activities			
Staff Air Pollution Spec		RD	1.0	\$8,249	8%	\$7,319	7/1/2007	6/30/2008	State Agency Coordination	Scoping Plan		
Staff Air Pollution Spec		RD	1.0	\$8,249	50%	\$49,494	7/1/2007	6/30/2008	Research/Science activities	Solar-Reflective Paints/Windows		Solar reflective roof paints/surfaces (stationary sources)
Staff Air Pollution Spec		RD	1.0	\$8,054	42%	\$40,592	2/1/2008	6/30/2008	Research/Science activities	Scoping Plan		
Staff Air Pollution Spec		RD	1.0	\$8,249	10%	\$9,899	7/1/2007	6/30/2008	Scoping Plan	LCFS	Research/Science activities	
Staff Air Pollution Spec		RD	1.0	\$8,249	5%	\$4,949	7/1/2007	6/30/2008	Research/Science activities			
Staff Air Pollution Spec		RD	1.0	\$8,249	70%	\$69,232	7/1/2007	6/30/2008	Scoping Plan	Scoping Plan		

ATTORNEY-CLIENT CONFIDENTIAL WORK PRODUCT  
 These numbers represent ARBs best conservative estimate as of the date of this document. 5/27/2009

Air Resources Board  
 Climate Change Staffing Resources  
 FY 07/08

EMPLOYEE CLASSIFICATION	EMPLOYEE NAME	DIV	Employee	Monthly SALARY FY 2007-08	% FY 2007-08	ANNUAL ALLOCATED COST FY 2007-08	Program Start Date	Program End Date	First Program Area	Second Program Area	Third Program Area	Notes (Displayed to show 1st/2nd/3rd Program Area split, and 7 starts per time)
Staff Air Pollution Spec		RD	1.0	\$8,249	50%	\$49,494	7/1/2007	6/30/2008	GHG Inventory	Research/Science activities		25/25
Staff Air Pollution Spec		RD	1.0	\$8,249	2%	\$1,960	7/1/2007	6/30/2008	Green buildings	Research/Science activities	High GWP in CP	
Staff Air Pollution Spec		RD	1.0	\$9,249	10%	\$9,899	7/1/2007	6/30/2008	Research/Science activities	Scoping Plan	Early Action Board Item	30/30/20
Staff Air Pollution Spec		RD	1.0	\$4,125	80%	\$39,595	7/1/2007	6/30/2008	Mobile A/C	Scoping Plan		30/30
Staff Air Pollution Spec		RD	1.0	\$8,249	60%	\$59,393	7/1/2007	6/30/2008	GHG Inventory	Research/Science activities		
Staff Services Analyst-Gen		RD	1.0	\$2,221	25%	\$6,662	7/1/2007	6/30/2008	Early Action Board Item	Scoping Plan		Climate change related administrative support. OT 7/1/2007-1/31/2008, Staff Services Analyst after 1/31/2008.
Staff Services Analyst-Gen		RD	1.0	\$3,893	30%	\$14,015	7/1/2007	6/30/2008	Scoping Plan	Early Action Board Item		Climate change related administrative support
Staff Services Analyst-Gen		RD	1.0	\$2,021	1%	\$243	7/1/2007	6/30/2008	CC Related Library Support			
Staff Services Mgr I		RD	1.0	\$5,483	20%	\$13,169	9/1/2007	6/30/2008	Research/Science activities			
Supervising Librarian II		RD	1.0	\$6,999	5%	\$3,839	7/1/2007	6/30/2008	CC Related Library Support			
Air Pollution Spec		SSD	1.0	\$7,214	25%	\$21,642	7/1/2007	6/30/2008	Oil/Gas Exh&Tran			
Air Pollution Spec		SSD	1.0	\$4,452	40%	\$21,376	7/1/2007	6/30/2008	Tire Pressure			
Air Pollution Spec		SSD	1.0	\$3,903	3%	\$1,405	11/1/2007	6/30/2008	LCFS			
Air Pollution Spec		SSD	1.0	\$6,166	39%	\$24,425	2/1/2008	6/30/2008	Electricity programs (efficiency/CHP/PPS)			
Air Pollution Spec		SSD	1.0	\$7,214	80%	\$69,254	7/1/2007	6/30/2008	Landfills			
Air Pollution Spec		SSD	1.0	\$7,214	80%	\$69,254	7/1/2007	6/30/2008	Electricity programs (efficiency/CHP/PPS)			
Air Pollution Spec		SSD	1.0	\$5,997	50%	\$35,982	1/1/2008	6/30/2008	LCFS			
Air Pollution Spec		SSD	1.0	\$7,083	17%	\$14,409	1/1/2008	6/30/2008	LCFS			
Air Pollution Spec		SSD	1.0	\$6,549	10%	\$7,859	7/1/2007	6/30/2008	High GWP in CP			
Air Pollution Spec		SSD	1.0	\$3,903	20%	\$9,367	1/1/2008	6/30/2008	Tire Pressure			
Air Pollution Spec		SSD	1.0	\$6,777	30%	\$24,397	7/1/2007	6/30/2008	High GWP in CP			
Air Pollution Spec		SSD	1.0	\$7,214	20%	\$17,314	7/1/2007	6/30/2008	VSR			
Air Pollution Spec		SSD	1.0	\$6,237	30%	\$22,453	7/1/2007	6/30/2008	Oil/Gas Exh&Tran			
Air Pollution Spec		SSD	1.0	\$3,903	8%	\$3,747	6/1/2008	6/30/2008	Oil/Gas Exh&Tran			
Air Pollution Spec		SSD	1.0	\$6,649	55%	\$43,226	7/1/2007	6/30/2008	Scoping Plan			
Air Pollution Spec		SSD	1.0	\$5,617	100%	\$81,894	7/1/2007	6/30/2008	Scoping Plan	LCFS	Refineries	
Air Pollution Spec		SSD	1.0	\$7,899	8%	\$7,583	6/1/2008	6/30/2008	LCFS			
Air Pollution Spec		SSD	1.0	\$7,214	10%	\$8,651	7/1/2007	6/30/2008	High GWP in CP			50/25/25
Air Pollution Spec		SSD	1.0	\$7,214	5%	\$4,328	1/1/2008	6/30/2008	Electricity programs (efficiency/CHP/PPS)			
Air Pollution Spec		SSD	1.0	\$3,925	15%	\$7,065	10/1/2007	6/30/2008	Methane capture			
Air Pollution Spec		SSD	1.0	\$7,214	5%	\$4,328	7/1/2007	6/30/2008	Scoping Plan			
Air Pollution Spec		SSD	1.0	\$5,712	25%	\$17,186	4/1/2008	6/30/2008	LCFS			
Air Pollution Spec		SSD	1.0	\$3,903	3%	\$1,405	1/1/2008	6/30/2008	Shorepower			
Air Pollution Spec		SSD	1.0	\$7,214	70%	\$60,598	7/1/2007	6/30/2008	Scoping Plan	Cement		50/50
Air Pollution Spec		SSD	1.0	\$5,771	7%	\$4,848	7/1/2007	6/30/2008	Shorepower			7
Air Pollution Spec		SSD	1.0	\$6,875	100%	\$8,250	7/1/2007	6/30/2008	Tire Pressure			
Air Pollution Spec		SSD	1.0	\$7,214	100%	\$23,576	7/1/2007	6/30/2008	Semiconductors			
Air Pollution Spec		SSD	1.0	\$6,549	30%	\$33,653	7/1/2007	6/30/2008	VSR			
Air Pollution Spec		SSD	1.0	\$4,674	60%	\$28,044	7/1/2007	6/30/2008	Scoping Plan	Cement		30/30
Air Pollution Spec		SSD	1.0	\$4,674	50%	\$28,044	7/1/2007	6/30/2008	Methane capture			
Air Pollution Spec		SSD	1.0	\$4,674	59%	\$32,591	12/1/2007	6/30/2008	LCFS			
Air Pollution Spec		SSD	1.0	\$6,549	2%	\$1,572	7/1/2007	6/30/2008	Scoping Plan			
Air Pollution Spec		SSD	1.0	\$4,674	30%	\$16,826	7/1/2007	6/30/2008	Methane capture			
Air Pollution Spec		SSD	1.0	\$7,214	38%	\$22,896	12/1/2007	6/30/2008	Semiconductors			
Air Pollution Spec		SSD	1.0	\$7,214	20%	\$17,314	7/1/2007	6/30/2008	Scoping Plan	Tire Pressure		10/10
Air Resources Engr		SSD	1.0	\$7,617	1%	\$914	7/1/2007	6/30/2008	Shorepower			
Air Resources Engr		SSD	1.0	\$6,549	5%	\$3,929	7/1/2007	6/30/2008	VSR			
Air Resources Engr		SSD	1.0	\$7,617	40%	\$6,562	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$7,214	58%	\$50,269	12/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$6,850	4%	\$3,278	7/1/2007	6/30/2008	High GWP in CP			
Air Resources Engr		SSD	1.0	\$5,940	15%	\$10,692	10/1/2007	6/30/2008	Scoping Plan			
Air Resources Engr		SSD	1.0	\$7,214	8%	\$6,925	6/1/2008	6/30/2008	Oil/Gas Exh&Tran			
Air Resources Engr		SSD	1.0	\$6,871	30%	\$24,737	7/1/2007	6/30/2008	Glass Manufacturing			
Air Resources Engr		SSD	1.0	\$4,279	3%	\$1,546	1/1/2008	6/30/2008	Electricity programs (efficiency/CHP/PPS)			
Air Resources Engr		SSD	1.0	\$5,940	26%	\$19,958	8/1/2007	6/30/2008	Scoping Plan			
Air Resources Engr		SSD	1.0	\$7,617	5%	\$4,570	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$7,214	10%	\$8,657	7/1/2007	6/30/2008	Semiconductors			

ATTORNEY-CLIENT CONFIDENTIAL WORK PRODUCT  
 These numbers represent ARBs best conservative estimate as of the date of this document, 5/27/2009

Air Resources Board  
 Climate Change Staffing Resources  
 FY 07/08

EMPLOYEE CLASSIFICATION	EMPLOYEE NAME	DIV	Employee	Monthly SALARY FY 2007-08	% FY 2007-08	ANNUAL ALLOCATED COST FY 2007-08	Program Start Date	Program End Date	First Program Area	Second Program Area	Third Program Area	Notes (Displayed to show staff/2009/08 Program Area split, and (staff's part time)
Air Resources Engr		SSD	1.0	\$1,721	2%	\$1,721	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Engr		SSD	1.0	\$7,617	10%	\$9,140	7/1/2007	6/30/2008	Scoping Plan	LCFS		
Air Resources Engr		SSD	1.0	\$7,617	10%	\$9,140	7/1/2007	6/30/2008	Scoping Plan			5/5
Air Resources Engr		SSD	1.0	\$4,899	50%	\$2,939	7/1/2007	6/30/2008	NG Transmission			
Air Resources Engr		SSD	1.0	\$5,145	25%	\$15,435	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$4,899	92%	\$4,089	8/1/2007	6/30/2008	Semiconductors			
Air Resources Engr		SSD	1.0	\$4,279	40%	\$20,538	7/1/2008	6/30/2008	Tire Pressure			
Air Resources Engr		SSD	1.0	\$7,617	55%	\$50,272	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Engr		SSD	1.0	\$7,214	100%	\$65,668	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$7,214	100%	\$65,668	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$6,270	1%	\$752	6/30/2008	6/30/2008	Electricity programs (efficiency/CHPPRS) Methane capture			
Air Resources Engr		SSD	1.0	\$7,214	10%	\$8,857	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$4,899	25%	\$14,697	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$4,899	5%	\$2,939	7/1/2007	6/30/2008	LCFS			
Air Resources Engr		SSD	1.0	\$7,258	58%	\$50,516	12/1/2007	6/30/2008	NG Transmission			
Air Resources Engr		SSD	1.0	\$7,214	25%	\$21,842	7/1/2007	6/30/2008	Cement			
Air Resources Engr		SSD	1.0	\$7,214	1%	\$866	7/1/2007	6/30/2008	Cement			
Air Resources Engr		SSD	1.0	\$6,956	92%	\$7,794	6/1/2007	6/30/2008	LCFS			
Air Resources Supv I		SSD	1.0	\$9,965	30%	\$32,274	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supv I		SSD	1.0	\$8,965	25%	\$26,895	7/1/2007	6/30/2008	Scoping Plan	Landfills		12/12
Air Resources Supv I		SSD	1.0	\$8,154	100%	\$97,848	7/1/2007	6/30/2008	NG Transmission			90/10
Air Resources Supv I		SSD	1.0	\$8,965	100%	\$107,580	7/1/2007	6/30/2008	Semiconductors			
Air Resources Supv I		SSD	1.0	\$9,965	10%	\$10,758	7/1/2007	6/30/2008	LCFS			
Air Resources Supv I		SSD	1.0	\$9,965	30%	\$22,274	7/1/2007	6/30/2008	Scoping Plan	Vessel Speed Reduction	Glass Manufacturing	11/1/18
Air Resources Supv I		SSD	1.0	\$8,965	47%	\$80,658	12/1/2007	6/30/2008	LCFS			
Air Resources Supv I		SSD	1.0	\$8,965	20%	\$21,816	7/1/2007	6/30/2008	High GWV in CP			
Air Resources Supv I		SSD	1.0	\$7,575	35%	\$31,815	12/1/2007	6/30/2008	Scoping Plan	Electricity programs (efficiency/CHPPRS) Tire Pressure		28/10 28/25
Air Resources Supv I		SSD	1.0	\$8,965	50%	\$83,790	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supv I		SSD	1.0	\$8,965	20%	\$21,816	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supv I		SSD	1.0	\$7,777	10%	\$9,333	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supv I		SSD	1.0	\$8,965	25%	\$26,895	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supv I		SSD	1.0	\$8,965	25%	\$26,895	7/1/2007	6/30/2008	Scoping Plan	Shorepower		28/2
Air Resources Supv I		SSD	1.0	\$8,965	50%	\$53,790	7/1/2007	6/30/2008	Scoping Plan	Cement		28/25
Air Resources Supv II		SSD	1.0	\$9,842	25%	\$29,526	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supv II		SSD	1.0	\$9,842	10%	\$11,810	7/1/2007	6/30/2008	Scoping Plan			
Air Resources Supv II		SSD	1.0	\$9,842	60%	\$59,052	7/1/2007	6/30/2008	Scoping Plan	Semiconductors		28/25
Air Resources Supv II		SSD	1.0	\$9,842	80%	\$84,483	7/1/2007	6/30/2008	LCFS			
Air Resources Supv II		SSD	1.0	\$9,842	20%	\$23,621	7/1/2007	6/30/2008	Scoping Plan	Electricity programs (efficiency/CHPPRS)	Cement	11/1/18
Assoc Govtl Prog Analyst		SSD	1.0	\$4,517	5%	\$2,710	7/1/2007	6/30/2008	LCFS			
Asst Div Chief		SSD	1.0	\$10,339	25%	\$31,071	7/1/2007	6/30/2008	High GWV in CP			12/25
C.E.A.		SSD	1.0	\$10,856	50%	\$55,136	7/1/2007	6/30/2008	Scoping Plan	Semiconductors		20/25/5
Exec Asst		SSD	1.0	\$9,996	5%	\$2,998	7/1/2007	6/30/2008	LCFS			General Support
Office Techn-Typing		SSD	1.0	\$3,284	70%	\$27,418	7/1/2007	6/30/2008	LCFS			
Staff Air Pollution Spec		SSD	1.0	\$8,249	5%	\$4,949	7/1/2007	6/30/2008	Shorepower			50/50
Staff Air Pollution Spec		SSD	1.0	\$6,871	100%	\$9,456	7/1/2007	6/30/2008	Scoping Plan	Refineries		
Staff Air Pollution Spec		SSD	1.0	\$8,054	10%	\$9,899	7/1/2007	6/30/2008	Scoping Plan			
Staff Air Pollution Spec		SSD	1.0	\$8,249	10%	\$9,899	7/1/2007	6/30/2008	Scoping Plan			
Staff Air Pollution Spec		SSD	1.0	\$8,249	10%	\$9,899	7/1/2007	6/30/2008	Scoping Plan			
Staff Air Pollution Spec		SSD	1.0	\$8,249	10%	\$9,899	7/1/2007	6/30/2008	Scoping Plan	Methane Capture		5/5
Staff Air Pollution Spec		SSD	1.0	\$8,249	20%	\$19,788	7/1/2007	6/30/2008	Scoping Plan			
Staff Air Pollution Spec		SSD	1.0	\$8,249	92%	\$81,068	8/1/2007	6/30/2008	Semiconductors			19/73
Staff Air Pollution Spec		SSD	1.0	\$6,598	20%	\$15,938	7/1/2007	6/30/2008	Scoping Plan	NG Transmission		
Staff Air Pollution Spec		SSD	1.0	\$6,549	20%	\$15,938	7/1/2007	6/30/2008	Goods Movement Efficiency			
ARB TOTAL:		SSD	311.0			\$10,611,548						

\*Div is Division.  
 ED is Enforcement Div.,  
 EO (OCC) is Executive Office (Office of Climate Change  
 MLD is Monitoring and Laboratory Div.  
 MSCD is Mobile Source Control Div.  
 MSCD is Mobile Source Operations Div.  
 PTSD is Planning and Technical Support Div.  
 RD is Research Div.  
 SSD is Stationary Source Div.

5/27/2009 Version  
 Page 6 of 6

# **ATTACHMENT C**

ATTORNEY -CLIENT CONFIDENTIAL WORK PRODUCT

Air Resources Board  
Climate Change Staffing Resources  
Summary

	SALARY FY 2007-08	AVERAGE % OF TIME FY 2007-08	ALLOCATED COST FY 2007-08	SALARY FY 2008-09	AVERAGE % OF TIME FY 2008-09	ALLOCATED COST FY 2008-09
0211	\$15,733	82%	\$12,422	\$17,526	78%	\$13,156
Leg Off	\$43,833	34%	\$18,236	\$60,983	31%	\$18,884
EO	\$140,826	99%	\$137,874	\$152,118	97%	\$142,595
RD	\$137,222	31%	\$41,012	\$225,467	32%	\$71,299
SSD	\$522,550	44%	\$230,100	\$550,968	48%	\$274,022
MSD	\$603,700	37%	\$230,015	\$734,998	47%	\$349,866
MSD	\$34,877	41%	\$14,602	\$16,981	41%	\$8,007
MSD	\$109,985	53%	\$54,609	\$151,825	66%	\$96,691
PTSD	\$368,854	55%	\$188,504	\$425,086	50%	\$187,132
ASD	\$105,849	11%	\$8,722	\$139,595	11%	\$15,336
MSOD	\$71,697	9%	\$6,470	\$144,717	10%	\$9,664
TOTAL:	\$2,166,173	45%	\$925,617	\$2,520,264	46%	\$1,184,650

\* Average percentage of time of only those staff in the specified Division/Office working on Climate Change.  
Does not reflect percentage of total Division/Office staffing.

**TAB**

F



Pillsbury Winthrop Shaw Pittman LLP  
50 Fremont Street | San Francisco, CA 94105-2228 | tel 415.983.1000 | fax 415.983.1200  
MAILING ADDRESS: P. O. Box 7880 | San Francisco, CA 94120-7880

Scott A. Sommer  
tel 415.983.1813  
scott.sommer@pillsburylaw.com

May 26, 2009

Via Electronic Transmission  
([dwhitney@arb.ca.gov](mailto:dwhitney@arb.ca.gov))

Daniel Whitney, Esq.  
Staff Counsel  
Office of Legal Affairs  
California Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, CA 95814

Via Electronic Transmission  
([Bruce.Reeves@doj.ca.gov](mailto:Bruce.Reeves@doj.ca.gov))

Bruce Reeves, Esq.  
Deputy Attorney General  
California Attorney General's Office  
Post Office Box 944255  
Sacramento, CA 94244-2550

Re: Requests dated February 13, 2009 for Disclosure of Basis for Proposed Greenhouse Gas Fees; *California Business Properties Association, et al. v. California Air Resources Board*, Sacramento County Superior Court No. 34-2009-80000232

Dear Messrs. Whitney and Reeves:

In an effort to resolve what our clients refer to as the 'data gaps' in the CARB production of documents through April 30, 2009, we are providing the following questions for review by CARB staff and counsel:

1. In the blanks on the attached spreadsheet, please provide the actual expenditures by CARB for each program measure or AB 32 activity, in number of person years, salaries in dollars, contract costs in dollars, and other costs in dollars for each of the fiscal years 2007/2008, 2008/2009, and projected expenditures by CARB in person years, salaries, contracts and other costs for 2009/2010.

Daniel Whitney, Esq.  
Bruce Reeves, Esq.  
May 26, 2009  
Page 2

2. What is the process by which CARB staff reviews person years and staff expenditures to confirm that borrowed funds were spent on AB 32 implementation activities? What are CARB's internal methods of tracking time and activities of CARB staff as relates to an AB 32 activity?
3. How does CARB distinguish between "climate change positions" in the Staff Report and actual AB 32 work? Is CARB claiming that all its work related to climate change is AB 32 activity and thus supported by the fee?
4. Were all contracts described in CARB's budget change proposals from past years actually performed? Are these continuing contracts that CARB will carry over to each budget year?
5. What data, studies, analysis, or information support CARB's statement that 13% of operating and administrative expenses can be attributed to AB 32 activities, including activities performed by the Chairman's Office and the Executive Office?
6. What data, studies, analysis, or information did CARB rely on in deciding not to pursue the downstream collection approach mentioned in the Staff Report?
7. What data, studies, analysis, or information did CARB staff rely on in deciding that the upstream sources were best able to pass costs on to downstream end users?
8. What data, studies, analysis, or information support the contention on page 46 of the Staff Report that demand for gasoline and diesel is inelastic, and that fees can easily be passed on to end users for these fuels?

9. What data, studies, analysis, or information did CARB rely on in deciding not to expand the fee to additional sources of greenhouse gases that are excluded from the fee (i.e., the excluded 15%), including any justification for any finding that it was not "technically and economically feasible" to include such gases?

10. If CARB plans on establishing a separate fee for sources of high GWP gases, why are implementation measures addressing high GWP gases included in the proposed AB 32 fee regulation? Wouldn't the equitable approach be to apply these costs to the new high GWP gas fee regulation that CARB claims is under development? (See Staff Report p. 13.)

11. Were there written communications between CARB and other state agencies regarding the development of the AB 32 fee regulation, and the development of the fee rates for different sources? What is the procedure by which CARB and other state agencies coordinate collaboration on AB 32-related activities?

12. What information did CARB rely on in concluding, as indicated at page 38 of the Staff Report, that collecting a fee on transportation fuels at the terminal, where the excise tax is currently collected, "would increase administrative burden?"

13. What information did CARB rely on in concluding that fees on coal, natural gas, gasoline, and diesel should pay for CARB's development and administration of greenhouse gas reduction measures that regulate landfill methane capture, high GWP gases, vehicle design and performance (e.g., Pavley II, tire inflation, reflective glazing, medium and heavy duty vehicle regulations), and local land use regulation?

Daniel Whitney, Esq.  
Bruce Reeves, Esq.  
May 26, 2009  
Page 4

Should you have any questions regarding the foregoing, please contact John Hansen of this office or the undersigned.

Very truly yours,



Scott A. Sommer

Attachment

cc (w/attach): Mr. Carmen Madia, ARB  
Ellen Peter, Chief Counsel, ARB  
Holly Geneva Stout, Staff Counsel, ARB  
Erika Frank, General Counsel, California Chamber of Commerce  
Michele Pielsticker, Vice President and General Counsel, California  
Taxpayers' Association  
Tony Francois, KP Public Affairs  
California Business Properties Association  
California Independent Oil Marketers Association  
California League of Food Processors  
California Manufacturers & Technology Association  
California Small Business Alliance  
Howard Jarvis Taxpayers Association  
National Federation of Independent Business – California  
The California Black Chamber of Commerce  
Western States Petroleum Association

CARB AB 32 Program Analysis (per AB 32 Fee ISOR)

Complete one copy of this chart for FY 2007/2008, FY 2008/2009, and estimated costs for FY 2009/2010.

Measure	PY & Salaries (in dollars)	Contracts (in dollars)	Other Costs (equipment, general expenses, etc) (in dollars)	Total Expenditures (in dollars)
<b>I. Inventory and Reporting</b>				
A. Inventory				
B. Mandatory Reporting				
<b>II. Scoping Plan</b>				
<b>III. Greenhouse Gas Reduction Measures</b>				
<b>A. Discrete Early Actions</b>				
Diesel Auxiliary Engines on Ocean Going Vessels				
Reduction of High GWP GHG in Consumer Products				
Heavy Duty Vehicle GHG Emission Reduction				
Reduce Refrigerant Loss from Servicing Motor Vehicle AC				
PFC GHG Emissions from Semiconductor Sector				
SF6 from Non-Electric and Non-Semiconductor				
Underinflated Tires				
LCFS				
Landfill Methane Capture				
<b>B. Additional GHG Reduction Measures</b>				
Reflective Glazing				
Medium & Heavy Duty Hybridization				
Low Friction Engine Oil				
Pavley II				
Energy Efficiency & Co-Benefit Audits				
Refinery Methane Exemption				
Refinery Flares				
Oil and Gas Extraction				
Oil and Gas Transmission				
High GWP Gases				
Stationary R/AC Equipment				
Commercial/Industrial Refrigeration				
Foam Recovery/Destruction				
Residential Refrigeration				
Mobile Sources				
Consumer Products				
SF6 for Electric Sector				
High GWP Gas Fee				
Land Use				
Voluntary Emissions Protocols				
C. Cap and Trade				
<b>IV. Applied Studies and Scientific Analysis</b>				
<b>V. Support and Administration</b>				

STONEBRIDGE ASSOCIATES, INC.



4333 Jan Drive  
Carmichael, CA 95608  
916 524-8195  
jroza@earthlink.net

September 22, 2009

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Title 17. California Air Resources Board

Agenda Item No. 09-6-5: Notice of Public Hearing to Consider Adoption of a Proposed AB 32 Cost of Implementation Fee Regulation and Proposed Amendment to the Existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Date: September 25, 2009  
Time: 8:30 a.m.

Clerk of the Board:

I am the President of Stonebridge Associates, Inc., a legislative and regulatory consulting firm based in Sacramento, California.

My firm was recently retained by the California Business Properties Association, et al.<sup>1</sup> to examine documents from ARB's production of records in response to the Associations' May 28, 2009 Public Records Act requests.

We were asked to:

- Provide an overview of the types of record keeping/accounting systems one would expect to be used by ARB to identify past AB 32 expenditures.

---

<sup>1</sup> California Business Properties Association, California Chamber Of Commerce, California Independent Oil Marketers Association, California League Of Food Processors, California Manufacturers & Technology Association, California Small Business Alliance, California Taxpayers' Association, Howard Jarvis Taxpayers Association, National Federation Of Independent Business - California, The California Black Chamber Of Commerce, Western States Petroleum Association.

- Identify whether the records ARB produced were a complete and appropriate set of records for identifying past AB 32 expenditures,
- Provide a quantitative assessment of the extent to which the records produced support the figures reported by the ARB in tables 3a and 4a of the Staff Report.

Our key findings are as follows:

- AB 32 expenditure data for fiscal years 2007-08 and 2008-09, in Tables 3a and 4a of the staff report is not well supported by documents produced by ARB.
- Documents produced by ARB for FY 2007-08 and FY 2008-09 were consistent with Tables 3a and 4a for only 17 percent and 11 percent of expenditures, respectively.
- Tables 3a and 4a and their supporting spreadsheets were developed through a retroactive estimation exercise conducted in April and May 2009.
- Our analysis of Intermediate Product of this Estimation Exercise suggests that ARB may have double counted Overhead costs by removing the administrative services PY contribution without removing their salaries from total personnel expenditures. The same administrative services costs were also subsequently included in a separate cost category labeled Administrative Overhead.
- There are significant expenditures for Operating Costs, Equipment and Administrative Overhead, totaling \$17,471,431, for which no supporting data are provided.
- The ARB uses the CALSTARS system for all its accounting and reporting.
- The only way the data in Tables 3a and 4a and supporting spreadsheets can be determined to be accurate is through the examination of complete accounting records from ARB's CALSTARS accounting system.

I have made a copy of our report available for your review.

Sincerely,

  
John Rozsa  
President

**STONEBRIDGE ASSOCIATES, INC.**



**Analysis of Public Records Submitted in Support of  
Proposed AB 32 Greenhouse Gas Regulation Fee**

Prepared by:  
**Stonebridge Associates, Inc.**

**September 22, 2009**

Stonebridge Associates, Inc.  
4333 Jan Drive  
Carmichael, California 95608

(916) 524-8195

### **About Stonebridge Associates, Inc.**

John Rozsa is president and founder of Stonebridge Associates, Inc., a legislative and regulatory consulting firm based in Sacramento, California. Mr. Rozsa brings over two decades of experience in California state government to the firm and during his career served in both the Legislative and Executive branches.

Before founding Stonebridge Associates, Mr. Rozsa was Chief Consultant for the California Legislature's Joint Legislative Budget Committee and Senior Advisor to the Chairman of the Senate Budget Committee where he oversaw executive agency budget performance. Earlier, he was Principal Energy Consultant for the Senate Energy, Utilities and Communications Committee. Mr. Rozsa came to the Senate from the California Energy Commission where he was Manager of Scenario Planning and Manager of the Commission's Fuels Policy Office.

Mr. Rozsa is highly regarded in Sacramento for his policy expertise, as the author of successful legislation and for his knowledge of administrative procedure. His areas of policy expertise include energy, goods movement, environmental regulation and compliance, privacy, and the state budget process. Mr. Rozsa is also an expert in the development and analysis of opinion surveys on worker satisfaction.

Mr. Rozsa holds a B.A. in Mathematics from the University of California at Los Angeles, a Masters in Public Administration from Harvard University's John F. Kennedy School of Government and a Ph.D. in Social Psychology from the University of Texas at Austin.

### Summary

AB 32 expenditure data for fiscal years 2007-08 and 2008-09, published by ARB in the May 27, 2009 revisions of Tables 3a and 4a (ARB Published Data), is not well supported by documents supplied by ARB in response to the Associations' Public Records Act filings (Acquired Expenditure Data).

ARB Published Data for FY 2007-08 and FY 2008-09 were found to be consistent with Acquired Expenditure Data for 17 percent and 11 percent of expenditures, respectively.

ARB Published Data were developed through a retroactive estimation exercise conducted in April and May 2009. Much of the Acquired Expenditure Data appear to be from that exercise.

The documents that comprise the Acquired Expenditure Data generally do not permit a systematic review of the estimation exercise because they are deficient in one or more important dimensions.

One document used in ARB's estimation exercise, referred to here as the Intermediate Product, appears to be consistent with claimed personnel expenditures, but differences among initial, revised and final published PY raise questions about how those numbers were derived.

For example, analysis of the Intermediate Product suggests that ARB may have double counted Administrative Overhead costs by removing the administrative services divisions' PY contribution without removing their salaries from total personnel expenditures. The same administrative services costs were also subsequently included in a separate cost category labeled Administrative Overhead.

Contract expenditures for the two fiscal years that were at least partially supported by Acquired Expenditure Data total \$8,481,053 versus the claimed total of \$10,552,429. However, no accounting records substantiate these totals and the documentation that has been provided is internally inconsistent and incomplete.

There are also significant expenditures for Operating Costs, Equipment and Administrative Overhead, totaling \$17,471,431, for which no supporting data are provided.

The Acquired Expenditure Data contains a very limited set of accounting records from the CALSTARS system. Those CALSTARS records that were provided are incomplete both because they cover only a limited time period and subset of the relevant ARB organizations and because they do not identify AB 32 activities.

Since elements of the Acquired Expenditure Data appear to have been used to develop the ARB published Data, they are not independent of the published data

and do not validate the accuracy of the published data. The only way the ARB Published Data can be determined to be accurate is through the examination of complete accounting records from ARB's CALSTARS accounting system.

## Background

The California Global Warming Solutions Act of 2006, Assembly Bill 32 (Nuñez, Chapter 488, Statutes of 2006) requires California to reduce its greenhouse gas emissions to 1990 levels by 2020.

AB 32 authorized the California Air Resources Board (ARB) to adopt a schedule of fees to be paid by sources of greenhouse gas emissions to support the costs of carrying out AB 32.

The revenues from the assessed fees would be used to pay the ongoing AB 32 program costs incurred by ARB and other state agencies, beginning in the FY 2009-2010. During the first four years, the revenues would also be used to repay loans provided for in the respective State Budgets. The loans totaled \$15.2 million for FY 2007-08 and \$32 million for FY 2008-09 for a total of \$47.2 million.

On May 8, 2009, ARB issued an Initial Statement of Reasons (ISOR) in which it stated that it had "reviewed the person years and other expenditures related to AB 32 in each fiscal year<sup>1</sup>" and concluded that ARB had expended resources in excess of the loan amounts.

Specifically, ARB Published Data indicated that ARB's AB 32-related expenditures for FY 2007-08 and FY 2008-09 were \$25,193,775 and \$38,889,906<sup>2</sup>, respectively, for a total of \$64,083,681 or approximately \$16.9 million more than it received in loans.

Despite this large difference, ARB stated that it was proposing that only loan-related budgeted costs be recouped for prior fiscal years, in essence stating that it would absorb the substantial excess costs in its budget.

On February 13, 2009, the California Business Properties Association, et al.<sup>3</sup> (Associations) filed a Public Records Act request to the ARB requesting records regarding ARB's intended adoption of the proposed AB 32 fee regulation. The initial request was followed by two subsequent requests on May 28, 2009.

During the time since the original request, ARB has produced 9,463 pages of materials and withheld 48,728 pages under the claim of privilege. Of the pages produced by ARB, 254 pages were deemed by Associations' counsel to be related to AB 32 expenditures.

---

<sup>1</sup> Staff Report: Initial Statement Of Reasons For Rulemaking, Proposed AB 32 Cost Of Implementation Fee Regulation And Proposed Amendment To The Regulation For The Mandatory Reporting Of Greenhouse Gas Emissions. May 8, 2009, Pg. 30.

<sup>2</sup> As revised May 27, 2009 and June 11, 2009.

<sup>3</sup> California Business Properties Association, California Chamber Of Commerce, California Independent Oil Marketers Association, California League Of Food Processors, California Manufacturers & Technology Association, California Small Business Alliance, California Taxpayers' Association, Howard Jarvis Taxpayers Association, National Federation Of Independent Business - California, The California Black Chamber Of Commerce, Western States Petroleum Association.

Stonebridge Associates, Inc. has been retained to examine the released documents deemed to be related to AB 32 expenditures (Acquired Expenditure Data) and:

- Provide an overview or summary of the types of record keeping and accounting systems that one would expect to be used by the Air Resources Board to identify past expenditures related to implementation of AB 32.
- Identify whether the Acquired Expenditure Data appear to be a complete set of the appropriate records for identifying past expenditures related to implementation of AB 32, and identify the types of records that should have been released but which are not present.
- Review the Acquired Expenditure Data and provide a quantitative assessment of the extent to which they support the figures reported by the Air Resources Board in tables 3a and 4a of the relevant Exhibits to the Administrative Fee Staff Report and identify those figures in tables 3a and 4a that are not supported by the records released, and those figures for which the standard accounting records were not provided.

#### **Overview of Record Keeping and Accounting Systems: CALSTARS**

The California State Accounting and Reporting System, also known as CALSTARS, provides state agencies with an automated organization and program cost accounting system for systematically accounting for all revenue, expenditures, receipts, disbursements, and property of the state.

The California Air Resources Board uses the CALSTARS system for all its accounting and reporting.

The CALSTARS system is known as a "single transaction" system. This means that each individual transaction is automatically coded for complete fund, appropriation, allotment, encumbrance, organization, program, project, revenue, expenditure, cost allocation, and general ledger accountability. Thus, no labor, contract or other expenditure transaction can be recorded without the appropriate reference information.

According to the California Department of Finance, current capabilities of the CALSTARS system that are relevant to validating ARB Published Data include:

- A comprehensive labor distribution capability that permits the distribution of personal services and staff benefits cost through timesheets by individual. Detailed reports by individual employee are provided as report files. A monthly detailed labor transaction file is available for report requests.

- A document tracking capability for accounting and reporting individual accounts receivable, accounts payable, and encumbrances such as for contracts and equipment, supply and service purchase orders.
- An automated cost allocation capability that allows indirect costs and administrative overhead to be allocated to programs, projects, activities and/or organizational units of an agency.
- A standard reporting process that allows agencies to prepare reports at any level of aggregation through on-line screens which allow them to tailor their reports for specific needs.

In other words, the CALSTARS system has a complete set of accounting records that memorialize all costs incurred for the implementation and administration of AB 32, and a report-generating capability that can produce reports at the aggregate agency, division, office, individual and transaction level for all AB 32 expenditures. CALSTARS records are, thus, the only reliable means for establishing the veracity of ARB Published Data.

## **Analysis of Acquired Expenditure Data**

### **1. Deficiencies in Acquired Documents**

The acquired documents<sup>4</sup> displayed a number of serious deficiencies that created insuperable difficulties in relating the data on the documents to the ARB Published Data. For example, documents comprising the Acquired Expenditure Data:

- Lack headers to indicate what organizational element or topic was represented
- Lack salary information
- Only include data for a single division
- Are blank or incomplete
- Fail to designate what FY was being represented
- Document requests for data but do not include responses to those requests
- Lack date information and either contradict or duplicate other documents covering the same spending category
- Contain internally conflicting information
- Lack complete fiscal year data for 2008-09

### **2. Evidence from Analysis of an Intermediate Product of the Estimation Exercise that Published ARB Data May Be Incorrect**

---

<sup>4</sup> All records reviewed, and all Bates numbers referenced, are from ARB's production of records in response to the Associations' May 28, 2009 Public Records Act requests. The only records relating to costs or financial data in the responses to the February 13, 2009 request were Budget Change Proposals, duplicates of which were re-released in the May 28 responses.

An attachment to an email dated May 4, 2009 that appeared to be an Intermediate Product in the estimation exercise was found in the Acquired Expenditure Data.<sup>5</sup>

The Intermediate Product consisted of scanned Excel spreadsheets and included initial and revised PY for FY 2007-08 and FY 2008-09, by position, with divisional affiliation and salary information. The scanned files were entered into Excel worksheets and analyzed. The Intermediate Product is presented in Appendix E.

An analysis was conducted of the Intermediate Product and compared with the ARB Published Climate Change Staffing Resources spreadsheets claimed by ARB to support tables 3a and 4a.

Despite the fact that the Intermediate Product is untitled and undated, the close similarities of total personnel expenditures in the Intermediate Product to those in the ARB published data makes these documents valuable for insight into how ARB developed some of the cost figures for Tables 3a and 4a.

The analyses are presented in Appendices B & C, Tables B-1, B-2, C-1 and C-2.

Tables in Appendix B compare estimated and published PY by position classification.

Tables in Appendix C compare estimated and published PY by division, with annual estimated expenses, and it is in this comparison that the most significant accounting anomalies can be observed.

Among those anomalies, the following should be highlighted:

#### **FY 2007-08**

- The Intermediate Product included PY and salary expenditures for individuals in divisions listed in the ISOR as components of Administrative Overhead, e.g., ASD, Legislative Office, OIS<sup>6</sup>, and PIO.
- Estimated total PY are reduced significantly between the Intermediate Product and the ARB published version in Table 3a but salary expenditures do not change a proportionate amount.
- In other words, the total expense listed in the Intermediate Product for persons working in Administrative Overhead appears to be absorbed into program costs despite the removal of their PY from total PY.
- The above raises the possibility that Administrative Overhead costs have been double counted, first by folding their costs into program costs and second by removing administrative services PY from the list of program PY and including the costs again in Administrative Overhead.

---

<sup>5</sup> Found at Bates Numbers 000419 to 000446.

<sup>6</sup> PY but not expenditures included.

- Total administrative services apparently folded into program costs for FY 2007-08 totaled \$565,639<sup>7</sup>. Total claimed Administrative Overhead was \$1,998,872.

### **FY 2008-09**

- This fiscal year appears to have the same problems as FY 2007-08 in that administrative services positions are removed from PY totals without having their removal proportionally reflected in expenditure totals, suggesting that these expenditures are being double counted.
- The administrative services costs in this case are larger<sup>8</sup> and total \$1,526,010<sup>9</sup> compared to total Administrative Overhead claimed for FY 2008-09 of \$1,961,069.
- Some divisions show significant changes in PY allocated to AB 32 activities between initial and revised totals, whereas the total PY do not reflect such large changes. For example, OIS decreases from 8.97 PY to 0.4, SSD increases from 47.41 PY to 57.16 PY, PTSD increases from 23.05 PY to 28.1 PY and EO (OCC) decreases from 35 PY to 19.5 PY between initial and revised. However, the change in total PY across all departments between initial and revised is less than 5 PY.
- The published PY count is very close to the revised PY count but reflects further rearrangements of PY among individual divisions.
- Despite these changes, individual positions that have had their percentage of time revised do not show any changes in total annual expenditures.

The analysis appears to compromise the validity of the ARB Published Data by showing that, during its estimation exercise, ARB changed personal PY amounts and divisional allocations without making parallel changes in personnel expenditures.

### **3. Contracts**

Documentation of FY 2007-08 and FY 2008-09 contracts awarded largely exists on undated spreadsheets. The spreadsheets fail to corroborate each other *and* fail to total to the amounts claimed in Tables 3a and 4a.

Moreover, there are no accounting documents, such as CALSTARS records or invoices, which confirm the contract amounts or even whether they were approved in a particular fiscal year.

An analysis and comparison of contract information is presented in Appendix D, in Tables D-1 and D-2 for FY 2007-08 and FY 2008-09, respectively. The findings of that analysis are summarized below for each fiscal year.

### **FY 2007-08**

---

<sup>7</sup> \$418,872 plus benefits.

<sup>8</sup> They include OIS positions

<sup>9</sup> \$1,130,042 plus benefits.

Table 3a lists a total Contracts expense of \$4,652,429. The documents furnished by ARB included several spreadsheets showing planned contracts. Many of these spreadsheets were un-dated, and some of them appear to have been preliminary, showing only a handful of the contracts listed elsewhere.

No two of these lists arrive at the same contracts total, nor does a single one of them show the total listed on 3a. Some of the more complete-looking lists show contracts totaling as much as \$5,804,379, while others show money allocated over various fiscal years and include a FY 2007-08 total of \$4,233,097.

**FY 2008-09**

Table 4a lists a total of \$5,900,000 in FY 2008-09 contracts. This amount is not supported by documents in the Acquired Expenditure Data.

At best, contracts that appear on more than one document<sup>10</sup> total \$4,247,956, several of which are noted on one of these documents as being "in process." Total contract amounts that can be tallied from lists in the Acquired Expenditure Data range from \$4,911,786 to \$639,145. It is not at all clear that the listed contracts were actually approved and had their funds encumbered in FY 2008-09.

The latest contract listing is associated with a cover email dated May 5, 2009. Employee notations within the spreadsheet itself indicate that it is in the process of being verified. More importantly, the document is dated prior to the end of the fiscal year and while it may have been ARB's intent to approve these contracts before the end of the fiscal year, there is no evidence that it did.

The absence of any internal documentation consistent with the contract amounts claimed in 3a and 4a would seem to make it doubly important that contract expenses be confirmed by some sort of fundamental accounting information that could substantiate that the claimed contract amounts were indeed paid out. However, this data has not been provided by ARB. Additionally, ARB has not provided copies of any contract proposals or invoices that would substantiate these contracts having been bid for, awarded or paid.

**4. Completely Unsubstantiated Costs**

The following cost categories are completely unsubstantiated in that not one piece of information has been provided to confirm that the expenditures even occurred.

<b>Categories</b>	<b>FY 2007-08</b>	<b>FY 2008-09</b>
General Expense	\$1,803,576	\$3,706,878
Printing	\$96,087	\$173,618
Communications	\$317,740	\$354,848
Postage	\$75,264	\$181,230
Training	\$313,600	\$362,460
Travel In-state	\$300,429	\$520,855

<sup>10</sup> Bates Numbers 000450-000452 and 002031-002042.

Facility	\$1,254,400	\$2,174,760
<b>Total</b>	<b>\$4,161,096</b>	<b>\$7,474,650</b>

These \$11.6 million in expenditures have been presented as the result of simple PY multiples of a stated Standard Average per Position Cost. However no evidence has been presented that would confirm the accuracy of the average cost used.

In addition, these expenditures are sensitive to the number of PY used. If ARB's PY count is as arbitrary as appears to be the case in the analysis of the Intermediate Product, total expenditures could be considerably different than claimed.

Especially troublesome is the General Expense rate of \$20,454 per person for FY 2008-09--a remarkably large rate for an expense category that is not only undocumented but that also, by ARB's own admission, does not even include expenses for facilities or Administrative Overhead.

Other unsubstantiated costs include:

<b>Categories</b>	<b>FY 2007-08</b>	<b>FY 2008-09</b>
Equipment	\$45,180	\$1,830,564
Administrative Overhead	\$1,998,872	\$1,961,069
<b>Total</b>	<b>\$2,044,052</b>	<b>\$3,791,633</b>

The earlier analysis of the Intermediate Product has suggested that there is a possibility that Administrative Overhead has been inflated through double counting. Regardless of whether that is the case, the amount claimed for Administrative Overhead is completely undocumented.

In the ISOR<sup>11</sup> ARB states it made the decision to not break down PYs for several divisions, including the Executive Office, Chairman's Office, Administrative Services Division and Office of Information Services, but instead estimated that 13% of the total costs of those divisions should be counted as "Administrative Overhead."

ARB states that that the 13 percent figure was arrived at because it determined that approximately 13 percent of program-related positions were budgeted as climate change positions.

However, no documents were provided that showed ARB's total numbers of "program-related positions," so it is impossible to see how the 13 percent figure was produced.

<sup>11</sup> Pg. 107

Additionally, there is no documentation of the total costs of the listed divisions, which, for example, in FY 2007-08 would be approximately \$15.4 million, if 13 percent of that total would come to the claimed figure of nearly \$2 million.

As regards equipment purchases, it is remarkable that no documentation of expenses in this category has been provided, in that it totals \$1,875,744 over the two fiscal years in question.

### **Data Tests Applied**

Despite the deficiencies in the Acquired Expenditure Data, each document was closely examined and two tests were applied to the "data" it included: 1) a consistency test, and 2) a validity test. The results of the test on each document are presented in Appendix A in Tables A-1 and A-2.

Data on a document was considered to be "consistent" if it appeared to match ARB published data. For example, if data for a particular division on a document in Acquired Expenditure Data matched either PY or salary data within ARB Published Data for that division, the data on the document was deemed "consistent."

Data was considered to be "valid" if it matched data from the few CALSTARS documents that were included among the Acquired Expenditure Data. No CALSTARS data was able to be matched for reasons discussed earlier.

An exception to the rule on matching was made in the case of the Intermediate Product. As detailed above, the Intermediate Product was an early version of the final spreadsheets, entitled Climate Change Staffing Resources, that ARB claims support its personnel expenditures for AB 32. Therefore, the Intermediate Product can not be said to independently confirm those spreadsheets.

Summary results for these tests for FY 2007-08 and FY 2008-09 are presented in the following Tables 1 and 2.

For FY 2007-08 and FY 2008-09, the only expenditures that could be considered consistent were some contract costs. None of the remainder of the data was deemed consistent. No data was deemed valid due to the absence of CALSTARS data.

<b>Table 1: Consistency and Validity of ARB Published AB 32 Position Information and Program Costs for FY 2007-08</b>				
<b>Personal Services and Operating Expenses</b>			<b>Consistency</b>	<b>Validity</b>
	<b>Number of PYs</b>	<b>Actual Annual Salaries (\$)</b>		
<b>Sub-Total</b>	<b>125.44</b>	<b>10,611,546</b>	<b>0</b>	<b>0</b>
<b>Benefits</b>				
<b>FICA</b>	<b>6.20%</b>	<b>657,916</b>	<b>0</b>	<b>0</b>
<b>Medicare</b>	<b>1.45%</b>	<b>153,867</b>	<b>0</b>	<b>0</b>
<b>Retirement</b>	<b>16.63%</b>	<b>1,764,700</b>	<b>0</b>	<b>0</b>
<b>Health</b>	<b>10.82%</b>	<b>1,148,169</b>	<b>0</b>	<b>0</b>
<b>Sub-Total</b>	<b>35.10%</b>	<b>3,724,653</b>	<b>0</b>	<b>0</b>
<b>Total Personal Services</b>		<b>14,336,199</b>	<b>0</b>	<b>0</b>
<b>Operating Costs</b>	<b>Standard Average Per Position Cost</b>	<b>Annual Cost</b>		
<b>General Expense</b>	<b>14,378</b>	<b>1,803,576</b>	<b>0</b>	<b>0</b>
<b>Printing</b>	<b>766</b>	<b>96,087</b>	<b>0</b>	<b>0</b>
<b>Communications</b>	<b>2,533</b>	<b>317,740</b>	<b>0</b>	<b>0</b>
<b>Postage</b>	<b>600</b>	<b>75,264</b>	<b>0</b>	<b>0</b>
<b>Training</b>	<b>2,500</b>	<b>313,600</b>	<b>0</b>	<b>0</b>
<b>Travel-In-State</b>	<b>2,395</b>	<b>300,429</b>	<b>0</b>	<b>0</b>
<b>Facilities</b>	<b>10,000</b>	<b>1,254,400</b>	<b>0</b>	<b>0</b>
<b>Sub-Total</b>	<b>33,172</b>	<b>4,161,096</b>	<b>0</b>	<b>0</b>
<b>Total Staff Related Costs:</b>		<b>18,497,295</b>	<b>0</b>	<b>0</b>
<b>Other Costs</b>				
<b>Contracts</b>		<b>4,652,429</b>	<b>4,233,097<sup>12</sup></b>	<b>0</b>
<b>Equipment</b>		<b>45,180</b>	<b>0</b>	<b>0</b>
<b>Administrative Overhead</b>		<b>1,998,872</b>	<b>0</b>	<b>0</b>
<b>Sub-Total</b>		<b>6,696,481</b>	<b>0</b>	<b>0</b>
	<b>Total Costs:</b>	<b>25,193,775</b>	<b>4,233,097</b>	<b>0</b>
<b>Percent Expenditures Accounted For</b>			<b>17%</b>	<b>0%</b>

<sup>12</sup> Per Bates Number 000150

Table 2: Consistency and Validity of ARB Published AB 32 Position Information and Program Costs for FY 2008-09				
Personal Services and Operating Expenses:			Consistency	Validity
	Number of PYs	Actual Annual Salaries (\$)		
<b>Sub-Total</b>	<b>181.23</b>	<b>16,086,806</b>	<b>0</b>	<b>0</b>
<b>Benefits</b>				
FICA	6.20%	997,382	0	0
Medicare	1.45%	233,259	0	0
Retirement	16.57%	2,665,584	0	0
Health	10.82%	1,740,592	0	0
<b>Sub-Total</b>	<b>35.04%</b>	<b>5,636,817</b>	<b>0</b>	<b>0</b>
<b>Total Personal Services</b>		<b>21,723,623</b>	<b>0</b>	<b>0</b>
<b>Operating Costs</b>	<b>Standard Average Per Position Cost</b>			
General Expense	20,454	3,706,878	0	0
Printing	958	173,618	0	0
Communications	1,958	354,848	0	0
Postage	1,000	181,230	0	0
Training	2,000	362,460	0	0
Travel-In-State	2,874	520,855	0	0
Facilities	12,000	2,174,760	0	0
<b>Sub-Total</b>	<b>41,244</b>	<b>7,474,650</b>	<b>0</b>	<b>0</b>
<b>Total Staff Related Costs:</b>		<b>29,198,273</b>	<b>0</b>	<b>0</b>
<b>Other Costs</b>				
Contracts		5,900,000	4,248,856	0
Equipment		1,830,564	0	0
Administrative Overhead		1,961,069	0	0
<b>Sub-Total</b>		<b>9,691,633</b>	<b>4,247,956</b>	<b>0</b>
	<b>Total Costs:</b>	<b>38,889,906</b>	<b>4,247,956</b>	<b>0</b>
<b>Percent Expenditures Accounted For</b>			<b>11%</b>	<b>0%</b>

### Discussion

The documents ARB has produced thus far do not support the notion that ARB Published Data is an accurate representation of expenditures incurred for AB 32. In fact, it would probably be more accurate to say that ARB has labored mightily to prevent the public from gaining access to data that would confirm its published numbers.

- There is poor consistency of Acquired Expenditure Data with Published ARB Data;
- Entire categories of expenditures are unconfirmed;
- ARB has refused to provide accounting data from the CALSTARS system that would validate Published ARB Data;

- The analysis of the Intermediate Product suggests the possibility of double counting of Administrative Services, or at least a cavalier approach to the linking of expenditures and PY;
- ARB has refused to provide the divisional results of its estimation exercise;
- ARB has not provided any other documentation of AB 32 activities dating back earlier than the spring of 2009, calling into question the accuracy of internal non-CALSTARS record-keeping;
- ARB's attorney made misleading statements regarding ARB's need to engage in an estimation exercise.<sup>13</sup>

## Conclusions

The preceding analysis and discussion has detailed both the inadequacies and the inconsistencies of the documentation provided by ARB in support of the figures published in its ISOR.

Appendix A of this report offers a catalogue of the AB 32 documentation that has been provided for FY 2007-08 and 2008-09, with an assessment of each item's ability to be used to corroborate or validate published ARB data. Appendices B, C and D offer detailed quantitative assessments of the data on usable documents pertaining to staffing and contract costs, with comparisons to figures published in Tables 3a and 4a.

The individual documents within the Acquired Expenditure data are found to be both incomplete and internally inconsistent. Not only do they fail to substantiate claimed expenditures, but they also raise serious questions about ARB's approach to keeping internal records of its AB 32 activities.

The Intermediate Product alone seems to indicate that ARB's retroactive estimation exercise produced figures that are unreliable. In conjunction with the assortment of contradictory documents pertaining to contracts and the total absence of documents supporting figures claimed for several other expense categories, it is impossible to know how ARB itself was able to produce figures for its AB 32 implementation costs, either for the fiscal years in question or for future fiscal years.

The CALSTARS accounting system, which ARB uses, has memorialized all costs incurred for implementation and administration at the project level. CALSTARS' report-generating capability can produce reports at the aggregate agency, division, office, individual, and transaction level for all AB 32 expenditures.

---

<sup>13</sup> The ARB attorney, Daniel J. Whitney, claimed that since the ARB did not keep hourly records of AB 32 implementation and administration costs, the time spent on AB 32 needed to be estimated by ARB division chiefs. In fact, every state employee, including those at ARB, completes a monthly time sheet in which the percent of time worked in a specific programs or projects is recorded. Whitney's statement is at DECLARATION OF DANIEL J. WHITNEY IN SUPPORT OF AIR RESOURCES BOARD'S OPPOSITION TO DISCLOSURE OF PRIVILEGED DOCUMENTS, CALIFORNIA BUSINESS PROPERTIES, ET AL., Case No. 34-2009-80000232, SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SACRAMENTO, May 7, 2009, pg. 7

Despite the powerful report-generating capabilities of this system, the only CALSTARS records ARB has made available thus far cannot be used to verify published data because they represent only a portion of the fiscal years and divisions in question and because they do not differentiate between AB 32 and general ARB activities.

In light of the overwhelming inadequacies of the Acquired Expenditure Data, CALSTARS records must be regarded as the only reliable means for establishing the veracity of data published by ARB in Tables 3a and 4a of its ISOR.

# **Appendix A**

## **Catalogue of Acquired Expenditure Data and Data Test Results**

Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08

Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000001, 000002	Untitled FY 2007-08; 2008-09	none	Columns show revised % of Time FY 2007-2008 and 2008-2009, with AB 32 products during those years	Doc. appears to be for a single division but lacks any header info. No salary information is shown. Total PYs for 2007-2008 come to 3.49 but cannot be used to verify 5/27/09 spreadsheet due to missing information.	No	No
000004 (duplicated on 000022, 000034)	PTSD FY 2007-2008	none	Handwritten reporting form showing "budgeted" and "other" staff working on some AB 32 products. Note at bottom reads "Excludes resources for CEQA and SB375 which have independent requirements"	Totals shown come to 26 PYs, including 17 PYs budgeted and 9 PYs redirected. This is the only department for which we have this form. Not all AB32 work products are listed. Also, 5/27/09 spreadsheet shows 49 positions in PTSD, indicating that this sheet does not represent that entire division's budgeted positions.	No	No
000007- 000008	Contracts (FY 2007-2008)	none	GHG Reporting: 250,000 Verifier Training: 200,000 Oil & Gas Exploration and Prod. Protocol: 60,000 CCAR Protocol: 586,000 Growth Surrogates for GHG Emissions: 250,000 Subtotal: 1,346,700 AQTPB Climate Change Resources: UC Berkeley to conduct a review of modeling studies of the impacts of transit, land use and pricing strategies on vehicle travel and greenhouse gas emissions: 194,000	Contracts shown for FY 2007-2008 total \$1,540,700. This is one of several contracts-related spreadsheets which are compared in the "Contracts" section of the accompanying spreadsheet.	Partially	No

**Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08**

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000013	PTSD - GHG Positions	9/18/07	Organizational chart for division; names are blacked out.	Hand-counting positions (which due to blacked out sections may not be 100 percent accurate) produces a division total of 141 positions; however, this sheet does not provide information on which of those positions are tasked with AB 32 work.	No	No
000014	PTSD - GHG Staff	9/18/07	Same as 000013, except a few names in the "Atmospheric Modeling & Support" section are not blacked out here. This sheet also lists one additional position as "Temp Help/OT."	Again, this chart provides an overview of a single division but does not seem to aid us in calculating totals of staff working on AB 32.	No	No
000016 (duplicated on 000028)	2007-08 PY	none	Names are blacked out; chart indicates "% time on CC only," with a PY total of 20.5. Division is not indicated.	Without knowing what division this is, this document cannot be used to corroborate staff PYs shown on the 5/27/09 spreadsheet.	No	No
000020 (duplicated on 000032)	AB 32 Work Products	none	Checklist of work products related to AB 32 implementation. Some items are corrected or crossed out and several have been added.	This appears to be a draft of a document that would have been provided so that individual employees could indicate the various AB 32 products they spent time on. However, we only have these blank draft checklists—no filled-out versions were part of the documentation provided by CARB.	No	No
000025 (Duplicated on 000037)	PTSD GHG Contracts for FY 2007-08	3/21/08	GHG Reporting Tool: 250,000 Develop & Implement Verifier Training: 200,000 Oil & Gas Exploration and Production Protocol: 60,000 Development of GHG Protocols: 290,000 total (180,000 for forestry protocols; \$110,000 for local government operations protocols)	Contracts shown total to \$800,000 but this document is only for PTSD and does not show amounts for contracts administered by other divisions.	Partially	No

**Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08**

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000026 (Duplicated on 000038)	EIB Climate Change Contracts for FY 2007-2008	11/21/08	<p>Note at top says these are "EIB Proposed contracts for GHG"; date is hand-written.</p> <p>GHG Reporting Tool: 250,000                      Develop &amp; Implement Verifier Training: 200,000                      Oil &amp; Gas Exploration &amp; production Protocol: \$60,000                      Development of GHG Reporting Protocols (CCAR): 586,000                      total (Forestry: 185,900; Local govts: 99,800; Community Inventory: 98,700; Wastewater Treatment entity: 72,600;                      Natural gas maintenance operation project: 25,600;                      Evaluation of Voluntary Reduction: 50,000; Other protocol evaluation support: 54,100)                      Update Growth Surrogates for CEFS and GHG: 250,000</p>	<p>Contracts shown total to \$1,346,000. Unclear why documents listed as "proposed" contracts for FY 07-08 would still be unconfirmed as of 11/08, a date several months into FY 08-09. EIB is the "Emissions Inventory Branch" of PTSD.</p>	Partially	No

**Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08**

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000040-000041 (duplicated) 000073-000074)	Subject: Instructions for documenting climate change resources	4/30/09	Listed attachments are spreadsheets showing AB32 hires for 07-08 and 08-09 and "ARB CC Staffing Resources FY07-08 for assignment". Email instructs division heads to fill out attached spreadsheets using hiring documents (showing budgeted positions) to accurately estimate staff start and end dates. Division heads are also instructed to list even those staff who worked less than 5% of time on AB 32, to list the program areas in which they worked, and to return these documents with their department name in the title. The email also notes that ASD will be providing a list of all personnel transactions to further aid them with these dates.	This appears to demonstrate an earnest effort to accurately estimate staff PYs for AB 32 products. However, individual divisions' draft versions produced in response to these instructions were not included in these documents, nor were any draft items or worksheets pertaining to how individual staff members' time was estimated.	No	No
000042-000051 (Duplicated on 000075-77, 000113-114 [missing a page], 000121 [missing a page], 000903-000907)	2007/2008 BCP/AB32 Only - Hiring Status Report	4/28/08	Appears to show budgeted and "filled or redirected" positions for AB 32 in various ARB divisions, along with position serial numbers and effective (hiring?) date. Bottom row total is 125.0 PY. No salary information is shown.	The email to division heads (000040-41) would seem to indicate that this document was furnished to division heads to aid them in dating start and end dates for staff in their divisions. The total shown includes budgeted positions in the Executive Office, Chairman's Office, Administrative Services Division and Office of Information Services. Total PYs for those divisions (which in 3a are counted as "Administrative Overhead" is 19. check against 000042?	No	No
000059	July 2007 Research Division	July 2007	Organizational chart for Research Division (RD). Shows vacancies and position serial numbers. Names are blacked out.		No	No

**Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08**

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000061	AB 32 Work Products	none	Another draft checklist of work products related to AB 32 implementation. Items are corrected or crossed out and several have been added.	This appears to be a draft of a document that would have been provided so that individual employees could indicate the various AB 32 products they spent time on. No filled-out versions were part of the documentation provided by CARB.	No	No
000071-000072	Research Division – Major Priorities and Projects for 2008	none	Shows all projects being worked on by various branches and sections of the Research Division. Projects are not broken out into AB 32/non-AB 32. "2008" is calendar year, not fiscal year. Staff time expenditures are not shown.	This document cannot be used to verify either contracts information or information on the 5/27/09 spreadsheet.	No	No
000087-000089	RE: Update to Instructions for documenting climate change resources	05/01/2009	Email: Explanation of attached HR documents (000097 through 000110) showing hires, transfers and promotions.	Furnished to division heads to help them accurately represent staff start and end dates for 5/27/09 spreadsheet.	No	No
000090 – 000096	Listing of all 120 Transactions from 4/01/2007 to 4/24/2009	printed 4/24/09	According to email (000087), this document reflects all internal staff transfers where unit/section number or serial number is changing. Includes start dates but does not contain information on position title/role or information about former position title/role.	<i>match with 000042?</i> This document could be used to verify staff start & end dates as represented on 000042, but it appears to be agency-wide and does not provide information about time spent on AB 32 work products.	No	No
000097-000101	Employees New to the Department (A02 codes)	printed 4/24/09	According to email (000087), this document reflects "external transfers (outside of ARB) and lateral transfers (internal and external)."	see note above	No	No
000102-000110	Employees New to the Department (A01 codes)	printed 4/24/09	According to email (000087), the A01 code is used "when an employment list is used for the movement (e.g., promotions)."	see note above	No	No
000112 (duplicated 000120)	Subject: FW: Instructions for documenting climate change resources	5/01/09	Request for CC PY figures for ASD (Administrative Services Division), with same attachments as in 000040-41.	Indicates intent to account for ASD in same manner as for other divisions, rather than counting that division as overhead.	No	No

**Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08**

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000134	Subject: FW: AB 32 contracts	4/03/09	From Sharon Simmons "I need to qualify that the total of the 07-08 contracts does not equal \$7 million and I confirmed with Matt Singh (budgets) that not all of the money has been spent. Also, there were some contract requests that proposed to use this money (contained on previous lists) but were subsequently canceled, so they are not reflected on this list. One last item I should clarify, there are some previous fiscal year agreements (beginning with "05" or "06") that were amended to add some of the 07-08 money."		No	No
000136	FY 07/08 List of Climate Change Related Contracts	3/30/09	Reflects contracts total of \$5,017,695.65 Three contracts totaling \$1,147,115 show start dates prior to FY 2007-2008.	see analysis under "contracts"	Partially	No
000150	AB 32 Related Contract List by FY	none (but must be 4/28/09 or later)	Lists contract money spent (or allocated) for FYs 04-05 through 09-10. Contracts total for FY 2007-2008 is \$4,233,097. Total contracts FY 04-05 through 09-10: \$6,012,935. Some contracts noted elsewhere are listed here as "not received as of 4/28/09" or are blacked out/listed as 0.	see analysis under "contracts"	Partially	No

Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000152	Subject: AB 32	3/05/09	"Attached spreadsheet provides information for both ARB and Cal/EPA covering Fiscal Years 2007-2008 through 2009-2010. For each specific fiscal year, detail is provided for positions, funding, a subset of the contracts and equipment amounts, actual loan amounts, and the Budget Act language authorizing each loan."	no spreadsheet is attached (Bates numbering jumps here from 150 to 398)	No	No
000399-402	Attorney-Client Confidential Work Product - Air Resources Board Climate Change Staffing Resources	undated (date of cover email - 000398 - is 4/02/09)	Total % of time by employee for Office of Information Services (OIS) for FY 2007-08 and 2008-09. Total shown is 735 %, or 7.35 PYs.	OIS positions were not itemized but instead were included in Administrative Overhead in 3a figures.	No	No
000420-000443	no title	none (email cover 000419 has date of 05/04/2009)	Untitled, undated chart shows position titles, employee names and divisions with monthly salaries, estimated percentages of time and revised percentages of time. Column headings are partially hidden (no FY is shown), but salaries for selected positions (some salary info is missing) can be correlated with salaries for same positions on 05/27/09 spreadsheet. Estimated percentages on this sheet do not always correlate with estimated percentages on published sheet, some of which appear to have been adjusted to reflect portion of FY worked in addition to estimated time worked on AB 32 products.	This document appears to be the likely predecessor to the published 5/27/09 spreadsheet and can be compared to some of the information on that sheet; however, there do appear to be some discrepancies/inconsistencies in how the %FY was calculated in the 5/27/09 sheet, based on figures in this sheet.	No	No

**Table A-1: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2007-08**

Bates #	Document Title or Topic	Date	Contents	Analysis	Consistent	Validates
000454-000455	AB 32-Related Contracts" 07/08 Fiscal Year	no date; email cover 000449 has date of 5/04/2009	Total contracts listed for FY 2007-2008 come to \$5,804,379. This sheet includes more detailed contract titles than 000150. According to cover email (000449), some contracts are highlighted with "percentages associated to GHG assignments"; however, contracts total does not reflect partial contract amounts.	Some contracts listed here are elsewhere listed as allocated in other FYs. See "contracts" analysis.		
000912	Fiscal Year 2007-2008	none	Blank except for "\$5.9 million filled in under "contracts."		No	No
000956-000965	Air Resources Board – AB 32 Position Information and Program Costs	3/22/09	1 Page each (plus one duplicate) for: Administration/Outreach and Support, Inventory, Planning, Reductions, Science. Each page shows number of positions (PYs) allocated and "average" salaries per position.	Total salaries allocated do not consistently represent actual product of shown average salary x positions allocated. Departments or Categories shown in these documents do not appear to match those shown in other documents/org. charts. No FY indicated.	No	No
000968-000971	Percent of Staff Working on Climate – July 2007 (positions.xls)	July 2007	Shows percentage of staff in various divisions' branches working on climate change. No PY figures shown.	Document is for first month of FY 2007-2008, before many new AB 32 hires became effective. Percentages of overall staff cannot be correlated with 5/27/09 spreadsheet.	No	No
000972-000975	Percent of Staff Working on Climate Based on July 2007 Organizational charts" (Positions Final 2.xls)	July 2007	Same as preceding except under EO, some Deputy Executive Officer Positions have been added and the Executive Officer's percentage adjusted downward.	see above note	No	No
000976-000979	Percent of Staff Working on Climate – July 2007" (Positions Final.xls)	July 2007	Appears to be identical to positions.xls (000968-000971)	see above note	No	No
004082-004087	ARB Climate Change Staffing Resources FY 07/08	5/27/09		This is the published spreadsheet available from ARB's website; total staffing costs correspond to amounts shown on 3a.	No	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
0000005	Respondent: PTSD FY 2008-2009	NONE	Titled Respondent with PTSD FY 2008-2009 hand written at the top. Contains three rows of a generic "Work Product" by budgeted staff for 1) Full-time, 2) Part-time, 3) other Full-time and 4) other Part-time; The document is a worksheet containing hand written estimates of staff beginning July 2008. The categories are: Emission Inventory, Mandatory Reporting Protocol Development, Forest Target and Accounting, and Land Use and transportation. Note at bottom reads "Excludes resources for CEQA and SB 375 which have independent requirements"	"PTSD FY 2008-09" title appears to support the number of positions beginning July 2008 for new fiscal year. No date or authorship of the document is available. 20 PYs were budgeted and 9 PYs were redirected. There is no context for the document. The worksheet appears to be submitted for an accounting purpose unexplained by the document itself. The document does not provide verifiable information relevant for cost recovery.	No	No
000010	Air Resources Board 2008-09 BCP & Finance Letters Summary of BCPs by Division for Facilities Purposes	4/30/2009	8 Classifications of employee job category by topic: 1) Ongoing implementation AB 32, and Low Carbon Fuel Standard, 2) Regulatory Implementation and Enforcement, 3) Carl Moyer, Implementation of AB 118, AB 233 and Prop 1B Goods Movement. Total of positions 77, including 10 redirections	The document summarizes the redirection of staff by division for ARB Budget Process. The document fails to provide dates staff redirections were made, it just total PY by department. It appears only three of the redirections are attributed to BCP #1-AB 32. The document lacks date, context and any relation to AB 32 costs.	No	No
000011-12	Air Resources Board 2008-09 Positions	none	Details redirections from departments. No reference to AB 32. Redirects 11 positions between departments.	The document is not dated, does not reference a department and has no connection to cost recovery of AB 32.	No	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
000016	2008-09 PYS	none	Chart with no title totaling % time on CC only. Names are blacked out. The document appears to be an attachment to a document not provided	The undated, unfiled document totaling an unidentified "cc" is of no use in supporting AB 32 cost recovery.	No	No
000018-19	Air Resources Board 2008/09 BCPs	none	Total of 27 positions by department effective 7/1/2008 -- the beginning of the fiscal year. These positions were created from 2008-09 BCP-#1 for AB 32.	No date or name of complete document the pages were prepared for. Appears to be part of a report for personnel accounting purposes. Positions named but not if or when they were filled.	No	No
000023	Duplicate 0000005					
000028	Duplicate 000016					
000030-31	Duplicate 000018-19					
000035	Duplicate 000005					
000052-53	AB 32 2008/2009 BCPs Originally Established/Positions Filled or Redirected	none	27 employees by BCP#1-AB 32 including position number, last name and department. Of the initial 27 positions, 11 were redirected, most of them the in 7/08 and 8/08.	Interim personnel report	No	No
000071- 000072	Research Division -- Major Priorities and Projects for 2008	none	Shows all projects being worked on by various branches and sections of the Research Division. Projects are not broken out into AB 32/non-AB 32. "2008" is calendar year, not fiscal year. No staff time or salary expenditures shown.	This document cannot be used to verify either contracts information or information on the 5/27 spreadsheet	No	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
000073-74	Memo from Audrey Barrett to Division Chiefs, et al. Titled: "Instructions for Documenting Climate Change Resources" with attachments: FY 07-08 AB 32 hires updated 4-30-09.xls; FY BCP 08-09 AB 32 hires.xls; ARB CC Staffing Resources FY 07-08 for assignment.xls; ARB CC Staffing Resources FY 08-09 for assignment.xls	4/30/09	Instructions and spreadsheets for estimating climate change work engaged in by each division by employee. Spreadsheets with employee names attached with information on hires.	No PY or Salary expenditures included. No responses to memo found in acquired data.	No	No
000078-79	Duplicate 000018-19, Triplicate 000030-31.					
000081-82	Duplicate 000052-53					
000083-85	AB 32 2008/2009 BCPs Originally Established (same form as 000052-53)	none	Two blank pages with a total page that displays "Total Vacant 28, Total Filled 27, and Total 07/08 BCPs 55.0. Under position number 87 BCPs appears.	The document title reflects the 08/09 fiscal year but the total at the bottom of the page is 07/08. This document conflicts with 000052-53 which documents the 27 positions. No divisional or agency-wide totals.	No	No
000087-00089	RE: Update to Instructions for documenting climate change resources originally provided 4/30/09 as shown in 000073-74	05/01/2009	Email: Explanation of attached HR documents (000097 through 000110) showing hires, transfers and promotions.	Furnished to division heads to help them accurately represent staff start and end dates for 5/27 spreadsheet. No PY or Salary information.	No	No
000090 - 000096	Listing of all 120 Transactions from 4/01/2007 to 4/24/2009	printed 4/24/09	According to email (000087), this document reflects all internal staff transfers where unit/section number or serial number is changing. Includes start dates but does not contain information on position title/role or information about former position title/role.	No Summary PY or Salary information. Just an account of staff transfers	No	No
000097-000101	Employees New to the Department (A02 codes)	printed 4/24/09	According to email (000087), this document reflects "external transfers (outside of ARB) and lateral transfers (internal and external)."	No Summary PY or Salary information. Just an account of staff transfers	No	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date printed	Contents	Analysis	Consistent	Validates
000102-000110	Employees New to the Department (A01 codes)	4/24/09	According to email (000087), the A01 code is used "when an employment list is used for the movement (e.g., promotions)."	No Summary PY or Salary information. Just an account of staff new to ARB.	No	No
000112	Subject: FW: Instructions for documenting climate change resources	5/01/09	Request for CC PY figures for ASD (Administrative Services Division), with same attachments as in 000040-41.	Indicates intent to account for ASD in same manner as for other divisions, rather than counting that division as overhead.	No	No
000115-16	Duplicate 000018-19, Triplet 000030-31, Quadruplet 000052-53, Quintuplet 000080-81					
000117-18	Air Resources Board 2008/2009 BCPs	none	Same content as 000018-19 without the employee numbers and start dates.	Interim Report that appears to be prepared for a document submitted on AB 32. Page numbers not reflected in document and not a complete account for divisional positions. Fails to provide information on staffing from source documents that can be verified.	No	No
000123-24	Duplicate 000018-19, Triplet 000030-32, Quadruplet 000078-79					
000125-26	Duplicate of 000117-18					
000150	AB 32 Related Contract List by FY	none	Lists contract money spent (or allocated) for FYs 04-05 through 09-10. Contracts total for FY 2008-2009 is \$646,145. Total contracts FY 04-05 through 09-10: \$6,012,935. Some contracts noted elsewhere are listed here as "not received as of 4/28/09" with amount attributed in the comment column by amount.	The Table 4a reflects \$5,900,000 for the 08/09 fiscal year. Only \$645,145 is reported in this table.	Partially	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
000152	Subject: AB 32	3/05/09	"Attached spreadsheet provides information for both ARB and Cal/EPA covering Fiscal Years 2007-2008 through 2009-2010. For each specific fiscal year, detail is provided for positions, funding, a subset of the contracts and equipment amounts, actual loan amounts, and the Budget Act language authorizing each loan."	no spreadsheet is attached (Bates numbering jumps here from 150 to 398)	No	No
000399-402	Attorney-Client Confidential Work Product -- Air Resources Board Climate Change Staffing Resources	undated (date of cover email -- 000398 -- is 4/02/09)	Total % of time by employee for Office of Information Services (OIS) for FY 2007-08 and 2008-09. Total shown for 2008/09 is 897% or 8.97 PYs.	Appears to be a second methodology to recreating staff time. Lacks actual timesheet input. OIS positions were not itemized but instead were included in Administrative Overhead in 4a figures in the Position Information and Program costs table. It is impossible to tease out the number from the aggregate.	No	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
000420-000443	no title	none (email cover 000419 has date of 05/04/2009)	<p>Untitled, undated chart shows position titles, employee names and divisions with monthly salaries, estimated percentages of time and revised percentages of time. Column headings are partially hidden (no FY is shown), but salaries for selected positions (some salary info is missing) can be correlated with salaries for same positions on 05/27 spreadsheet. Estimated percentages on this sheet do not always correlate with estimated percentages on published sheet, some of which appear to have been adjusted to reflect portion of FY worked in addition to estimated time worked on AB32 products.</p> <p>The administrative costs in Published ARB data are in a separate administrative overhead entry</p>	<p>This document appears to be the likely intermediate product and predecessor to the published 5/27 spreadsheet and can be used to corroborate some of the information on that sheet; however, there do appear to be some discrepancies and inconsistencies in how the %FY was calculated in the 5/27 sheet, based on figures in this sheet. Because this sheet includes PYs for ASD and OIS, those numbers can be totaled here.</p> <p>However, this information cannot be used to verify the ARB published information as it does not come from personnel records.</p>	No	No
0000449	PTSD 08/09 Contracts email/spreadsheet	5/5/09	<p>Email from Linda Murchison plus a partially verified list of GHG Contracts.</p>	<p>The attached list of contracts appears to be in the process of being reviewed by divisions for AB 32 relatedness. Shading within the document and margin notes indicate this process is only partially complete.</p>	Partially	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
000450-000458	AB 32-Related Contracts" 08/09 Fiscal Year	no date; email cover 000449 has date of 5/04/2009	List of contracts circulated to divisions who were charged with identifying AB 32 related contracts. Claimed sum for total contracts listed are all incorrect based on contracts listed. This sheet includes more detailed contract titles than 000150. Document contains notes about what proportion of each contract is related to AB 32. According to cover email (000449), some contracts are highlighted with "percentages associated to PTSD GHG assignments"; however, contracts total does not reflect partial contract amounts.	The fiscal year 08/09 total does not reflect the total claimed to have been spent in Table 4a. Total listed AB 32 contracts for FY 2008-09 sums to \$4,910,886.  Total may be too high because several contracts have notes next to them indicating their AB 32 status remains unknown.	Partially	No
000458	Climate Change Staffing Resources	6/11/09	ADS Division Names, class and salary with related percentages of time worked on climate change.	Totals 2.47 PY for 2008/09. The document is half copied and the title and other information are missing. The total administrative overhead cannot be calculated due to the missing data.	No	No
000908-910	Duplicate 00052-53, Triplicate 00080-81, quadruple 115-116, 5 <sup>th</sup> 124-135					
000956	Air Resources Board AB 32 Position Information and Program Costs: Administration Outreach and Support	3/22/09	Salaries by classification, average monthly salary, total positions allocated, monthly salaries allocated and total annual salaries allocated. Total cost estimated at \$1,666,515 and allocated for personnel services.	Personnel services estimated using averages instead of actual data. Retirement and health percentages differ from and are smaller than those used in Table 4a.	No	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
000957	Air Resources Board AB 32 Position Information and Program Costs – Inventory	3/22/09	Salaries by classification, average monthly salary, total positions allocated, monthly salaries allocated and total annual salaries allocated. Total cost estimated at \$2,077,006	Personnel services estimated using averages instead of actual data. Retirement and health percentages differ from and are smaller than those used in Table 4a.	No	No
000958	Air Resources Board AB 32 Position Information and Program Costs – Planning	3/22/09	Salaries by classification, average monthly salary, total positions allocated, monthly salaries allocated and total annual salaries allocated. Total cost estimated at \$1,785,990	Personnel services estimated using averages instead of actual data. Retirement and health percentages differ from and are smaller than those used in Table 4a.	No	No
000959	Air Resources Board AB 32 Position Information and Program Costs – Reductions	3/22/09	Salaries by classification, average monthly salary, total positions allocated, monthly salaries allocated and total annual salaries allocated. Total cost estimated at \$11,418,482 for Reductions.	Personnel services estimated using averages instead of actual data. Retirement and health percentages differ from and are smaller than those used in Table 4a. Reductions is not a division.	No	No
000960	Air Resources Board AB 32 Position Information and Program Costs – Science	3/22/09	Salaries by classification, average monthly salary, total positions allocated, monthly salaries allocated and total annual salaries allocated. Total cost estimated at \$2,023,338 for Science.	Same analysis as for 956-959 except Science is not a division and the estimate \$2,023,338 is undefined as to cost recovery for AB 32.	No	No
000961	Duplicate 000956					
000962	Duplicate 000957					
000963	Duplicate 000958					
000964	Duplicate 000959					
000965	Duplicate 000960					
002031	08/09 Cal EPA Contracts	3/17/09	\$120,000 DGS Office of Admin Hearings; \$214,200 OEHHA Consolidation of specific services to headquarters; \$494,442 DTSC centralized services	\$828,642 contracts from CAL EPA to other agencies. Not CARB related.	No	No
002032	08/09 ASD 800 Contracts	3/17/09	\$1,813,056.90 for 17 contracts approved on 3-17-09. Contract numbers 08-801 thru 08-822. Contracts not directly related to AB 32	Tire fee reimbursement, maintenance of alarms, security services, Audit services. Many contracts not related to AB 32	No	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
002032	Contract Requests in Process for Fiscal Year 08/09 by Division	3/17/09	\$642,500 for 4 contracts labeled ED 200 Contracts. Not related to AB 32. \$48,000 for a hotel in Napa under meeting facilities.	Contracts not related to AB 32	No	No
002033	EO CO 100 contracts	3/17/09	\$23,676 for 3 contracts. Legislative bill tracking service, complete smog check report.	Cal Start Contract for conference, two unrelated contracts.	No	No
002033	OIS 700 contracts	3/17/09	08-700 thru 08-713 totaling \$2,375,042.20 for 7 contracts.	\$2.1 million for DTS to provide e-mail services and \$179,760 to assist CARB in developing accounting programs	No	No
002034	MLD 600 contracts	3/17/09	08-500 thru 08-519 totaling \$407,849.28 for 11 contracts.	Maintenance contracts.	No	No
002034	MSCD 600 contracts	3/17/09	08-600 thru 08-612 totaling \$1,603,825 for 4 contracts	Department of Finance auditing services and equipment maintenance.	No	No
002035	MS OD 900 contracts	3/17/09	09-900 thru 08-911 totaling \$328261.12 for 6 contracts. CA Highway Patrol reimbursement for smoke testing.	Maintenance contracts and smoke testing reimbursement. Not AB 32 related.	No	No
002035	PTSD 700 contracts	3/17/09	08-751 thru 08-757 totaling \$465,621.22 for 4 contracts.	08-752 and 08-755 are listed on Bates 000450-452 as AB 32 for a total of \$424,900.	Partially	No
002036	RD 300 contracts	3/17/09	08-301, 08-309 and 08-312 - \$1,272,211 3 contracts	All AB 32 per Bates 000450-452	Partially	No
002036	SSD 400 contracts	3/17/09	08-402 thru 411 - \$925,000 3 contracts	Not AB 32	No	No
002037	08/09 Contract Requests in Process	3/17/09	08-000 thru 08-010 - \$951,096.86 for 9 contracts	Bill tracking and an environmental initiative. Not AB 32	No	No
002038	ASD 800 contracts	3/17/09	08-808 thru 08-821 - \$216,500 for 3 contracts	Sexual harassment training, moving services. Not AB 32.	No	No
002039	EO (OCC) 100 contracts	3/17/09	08-103, 08-104 and a non-numbered contract totaling \$757,447 for 3 contracts	Two AB 32 related per Bates 000450-452 for a total of \$577,447.	Partially	No
002039	OIS 700 contracts	3/17/09	08-707 thru 08-716 \$684,582.99 for 9 contracts	Software, web and e-mail support. Not AB 32	No	No
002040	MLD 500 contracts	3/17/09	08-503 thru 08-526 \$386,386.65 for 15 contracts	Maintenance	NO	No

**Table A-2: Catalogue of Acquired Expenditure Data and Data Test Results for FY 2008-09**

Bates #	Document title or Topic	Date	Contents	Analysis	Consistent	Validates
002040	MSCD 600 contracts	3/17/09	08-603 thru 08-613 \$59,394,999 for 8 contracts	Vehicle loans, unrelated contracts	No	No
002041	MSOD 900 contracts	3/17/09	08-906 thru 08-914 \$603,191 for 6 contracts	Maintenance	No	No
002041	PSTD 700 contracts	3/17/09	08-753 thru 08-764 \$1,050,471.20 for 10 contracts	Some related some not. Total related per Bates 000450-452 equals \$396,000	Partially	No
002042	RD 300 contracts	3/17/09	08-302 thru 08-333 \$7,345,280.50 for 28 contracts	Some related some not Total related per Bates 000450-452 equals \$2,273,065	Partially	No
002042	SSD 400 contracts	3/17/09	08-400 thru 08-421 \$3,299,354 for 18 contracts, Contracts in Process as of date.	Low carbon fuel standard related, no other contract related. Total related to AB 32 per Bates 000450-452 equals \$813,354	Partially	No
003572 - 003580	State Air Resources Board Expenditures by Program and Object: CALSTARS Report	2/13/09	As of 1/31/09, RD, Motor Vehicle Account	Does not distinguish AB 32 work from other work. Partial FY 2008-09	No	No
003582-3583	State Air Resources Board Expenditures by Program and Object: CALSTARS Report	2/13/09	As of 1/31/09, EO, Motor Vehicle Account	Does not distinguish AB 32 work from other work. Partial FY 2008-09	No	No
004080	Estimated Fee Revenue by Emission Source	3/24/09	Charges on output needed to recover payments and pay ongoing costs. Contemplates ongoing costs of \$55 million, exclusive of loan repayments	Not related to current proposal.	No	No
004088- 004095	ARB Climate Change Staffing Resources	5/27/09	ARB detail published 5/27/09 to support Tables 3a and 4a. Best conservative estimates \$16,086,806 for total staff allocation	Appears to be the method selected for cost recovery.	No	No

## **Appendix B**

**Comparisons of PYs and Staffing Expenditures from  
Intermediate Product with Totals Shown on ARB  
Tables 3a and 4a**

**Table B-1: Staffing by Position/Class FY 2007-08**

Data from Intermediate Product		Published Data		Data from Intermediate Product
Position/Class	Initial AB 32 PY	Revised AB 32 PY	Table 3a PY	Allocated Monthly Salaries
Air Pollution Spec Total	57.09	60.54	52.24	350237.9071
Air Res Sup I	18.64	19.3	19.5	159782.9
Air Res Sup II	7.5	7.75	7.47	71598.1
Air Resources Engineer	20.6	20.36	19.68	134136.41
Assoc. Governmental Prog.	1.98	1.98	1.6	9590.39
Assoc. Info Sys An/Sp	0.03	2.59	0.03	162.09
Asst Div Chief Total	1.5	0.45	1.4	4652.55
Auto Emissions Specialist II		0.3	0.3	1061.1
Auto Emissions Specialist III		0.66	0.66	
C.E.A. Total	3.41	1.62	2.95	15697.83
Environmental Program Manager	not shown	not shown	0.25	
Exec Asst.	0.3	0.3	1.13	1144.55
Instrument Techn Total	0.2	0.2	0.2	997.2
Library tech asst.	0.02	0.02	0.02	53.9
Office Techn-Typing Total	0.8	0.8	1.42	2040.8
Special Consultant Total	0.5	0.6	0.16	2531.4
Staff Air Pollution Specialist	12.82	13.97	14.62	103098.13
Staff Services Analyst-Gen Total	2.82	2.82	1.56	9907.54
Staff Services Manager I	0.58	0.58	0.2	3310.76
Supervising Librarian II Total	0.05	0.05	0.05	319.95
Asst Prog Analyst		0.63	not shown	0
Assoc. Personnel	0.3	0.3	not shown	1277.74
Bus. Services Analyst		0.2	not shown	728.8
Communications	0.4	0	not shown	0
Data Processing Manager III		0.3	not shown	
Information Officer		1.15	not shown	7370.35
Info Systems Techn Spec II Total		0.07	not shown	0
Office Asst-Gen Total	0.05	0.05	not shown	47.35
OT (T) / Exec asst.	1	1	not shown	2686
Personnel Spec.	0.03	0.03	not shown	89.79
Secretary Total	0.01	0.01	not shown	32.65
Sr Info Systems Analyst-Spec Total	0.02	1.08	not shown	135.76
Sr Programmer Analyst-Supvr Total		0.35	not shown	0
Staff info SystemsAnalyst-Spec Total		1.37	not shown	0
Staff Programmer Analyst-Spec Total		0.18	not shown	0
Staff Services Manager III	0.2	0.2	not shown	1432.6

<b>Table B-1: Staffing by Position/Class FY 2007-08</b>				
<b>Data from Intermediate Product</b>			<b>Published Data</b>	<b>Data from Intermediate Product</b>
<b>Position/Class</b>	<b>Initial AB 32 PY</b>	<b>Revised AB 32 PY</b>	<b>Table 3a PY</b>	<b>Allocated Monthly Salaries</b>
Staff Services Manager II	0.04	0.04	not shown	264.08
Systems Software Spec. I/II/III		0.65	not shown	0
<b>Totals:</b>	<b>130.89</b>	<b>142.5</b>	<b>125.44</b>	<b>884,388.63</b>
<b>Annual allocated salaries in Intermediate Product (monthly allocated times 12):</b>				<b>10,612,663.53</b>
<b>Annual allocated salaries listed on 3a:</b>				<b>10,611,546</b>
<b>Revised PYs in positions not represented on 3a:</b>				<b>7.61</b>
<b>Revised PYs in positions shown on 3a (non "administrative" positions):</b>				<b>134.89</b>

**Table B-2: Staffing by Position/Class FY 2008-09**

Data from Intermediate Product			Published Data	Data from Intermediate Product
Position/Class	Initial AB 32 PY	Revised AB 32 PY	Table 4a PY	Allocated Annual Salaries
Air Pollution Spec Total	80.085	79.545	84.44	6543664.76
Air Resources Engr Total	31.16	32.13	32.78	2689482.78
Air Resources Supvr I Total	23.56	25.32	26.2	2435212.212
Air Resources Supvr II Total	8.29	9.29	9.07	963002.16
Assoc Govtl Prog Analyst Total	2.14	1.14	0.68	69468.84
Assoc Info Systems Analyst-Spec Total	3.34	0.15	0.03	188520.6
Asst. Div Chief Total	1.65	1.5	1.35	197622.59
Auto Emission Test Spec II Total	0	0	0.25	0
C.E.A. I Total	3.125	2.27	1	397457.28
C.E.A. II Total	0	0	1.8	
Exec Asst Total	1.3	0.3	0.95	53757.6
Instrument Techn Total	0.2	0.2	0.2	11966.4
Library Tech Asst Total	0.02	0.02	0.02	646.848
Office Asst-Gen Total	0.05	0.7	0.7	1325.52
Office Techn-Typing Total	2.6	1.4	2.2	97544.52
Special Consultant Total		0.5	0.2	0
Staff Air Pollution Specialist Total	15.67	17.57	17.31	1639245.78
Staff Services Analyst-Gen Total	3.03	3.28	1.81	133658.256
Staff Services Mgr Total	0.9	0.8	0.2	65006.64
Supervising Librarian II Total	0.05	0.05	0.05	3839.4
Air Field Rep II Total	1.51	1.51	not shown	89928
Assoc Prog Analyst-Spec Total	0.58	0.03	not shown	41043.12
Assoc Acctg Analyst Total	0.05		not shown	3208.8
Assoc Budget Analyst Total	0.05		not shown	2772
Assoc Personnel Total	0.16	0.16	not shown	8439.552
Assoc Business Mgt Analyst Total	0.02	0.02	not shown	1283.52
Auto Emission Test Spec III Total	0.15	0.96	not shown	8179.2
Business Service Asst-Spec Total	0.05	0.05	not shown	2055.6
Business Service Officer II-Spec Total			not shown	0
Communications Director Total		0.35	not shown	0
DP Mgr III Total	0.33	0.02	not shown	32626.44
Info Officer I-Spec Total	0.01	0.01	not shown	641.76
Info Systems Techn Spec II Total	0.1	0.01	not shown	6432
Info Officer II Total	1.15	1.15	not shown	88444.2
Pers Spec Total	0.12	0.12	not shown	4756.68
Programmer II Total	0.05	0.01	not shown	1929.75
Secretary Total			not shown	0

**Table B-2: Staffing by Position/Class FY 2008-09**

Data from Intermediate Product			Published Data	Data from Intermediate Product
Position/Class	Initial AB 32 PY	Revised AB 32 PY	Table 4a PY	Allocated Annual Salaries
Sr Info Systems Analyst-Spec Total	1.26	0.06	not shown	98131.68
Sr Programmer Analyst-Spec Total	0.4	0.02	not shown	32626.8
Staff info Systems Analyst-Spec Total	1.62	0.08	not shown	114199.54
Staff Programmer Analyst-Spec Total	0.18	0.01	not shown	13966.56
Staff Services Mgr II Total	0.02	0.02	not shown	1584.48
Staff Services Mgr III-Supvry Total	0.45	0.45	not shown	40460.4
Systems Software Spec I-III Total	0.7	0.04	not shown	57640.56
<b>Totals:</b>	<b>186.13</b>	<b>181.245</b>	<b>181.23*</b>	<b>16141772.83</b>
* column actually totals to 181.24				
<b>Total annual allocated Salaries from Intermediate Product:</b>				<b>16,141,773</b>
<b>Total annual allocated Salaries shown on 4a:</b>				<b>16,086,806</b>
<b>Total revised PY for positions not shown on 4a</b>				<b>5.08</b>
<b>Total revised PY for positions shown on 4a</b>				<b>176.165</b>

# **Appendix C**

**Comparisons of PYs and Staffing Expenditures  
from Intermediate Product with Totals Shown on  
ARB Published 5-27-09 Climate Change Staffing  
Resource Spreadsheet**

<b>Table C-1: Staffing by Division FY 2007-08</b>						
<b>Data from Intermediate Product</b>					<b>Data from 5-27 Climate Change Staffing Resource Spreadsheet</b>	
<b>Division</b>	<b>Initial AB 32 PY</b>	<b>Revised AB 32 PY</b>	<b>Allocated Monthly Salaries ****</b>	<b>Allocated Yearly Salaries ***</b>	<b>Total PY</b>	<b>Allocated Yearly Salaries</b>
<b>ASD</b>	1.82	1.67	7,923	95,075	not listed	
<b>ED</b>	5.99	5.54	41,504	498,047	4.09	376,044
<b>EO (OCC)</b>	19.75	19.25	125,019	1,500,227	22.32	1,812,398
<b>LEG OFF</b>	2.45	2.45	12,422	149,067	not listed	
<b>MLD</b>	2.05	2.05	14,602	175,222	3.15	276,750
<b>MSCD</b>	6.35	7.35	54,609	655,313	6.60	630,633
<b>MSOD</b>	1.01	2.33	4,566	54,786	2.33	166,810
<b>OIS**</b>		7.53	0		not listed	
<b>PIO</b>	2.71	2.31	14,560	174,725	not listed	
<b>PTSD</b>	27.53	26.38	177,669	2,132,029	22.71	1,921,378
<b>RD</b>	30.06	31.46	214,106	2,569,268	31.25	2,600,939
<b>SSD</b>	32.02	34.22	217,409	2,608,902	32.99	2,826,592
<b>Totals across all divisions</b>	<b>131.74</b>	<b>142.54</b>	<b>884,389</b>	<b>10,612,664</b>	<b>125.44</b>	<b>10,611,544</b>
<b>Total excluding ASD, LEG OFF, OIS and PIO*</b>	<b>124.76</b>	<b>128.58</b>	<b>849,483</b>	<b>10,193,796</b>	<b>125.44</b>	<b>10,611,544</b>
<b>Totals for Excluded ASD, PIO, LEG OFF and OIS *</b>	<b>6.98</b>	<b>13.96</b>	<b>34,906</b>	<b>418,872</b>		
*These divisions are not listed on the 5-27 spreadsheet and according to the May 8 staff report were included in the amount noted as "Administrative overhead"						
** OIS lacks salary data for FY 07-08 and OIS positions have allocated salary amounts of zero. In FY 08-09, OIS positions <i>do</i> have allocated salaries.						
*** Yearly allocated salaries were not included in the Intermediate Product for FY 07-08; for the purposes of comparison, here they are calculated by multiplying the allocated monthly salaries by 12.						
**** There are several individual positions in departments other than OIS which show PY spent but do not include salary info.						

**Table C-2: Staffing by Division FY 2008-2009**

<b>Table C-2: Staffing by Division FY 2008-2009</b>					
<b>Data from Intermediate Product</b>				<b>Data from 5-27 Climate Change Staffing Resource Spreadsheet</b>	
<b>Division</b>	<b>Initial AB 32 PY</b>	<b>Revised AB 32 PY</b>	<b>Allocated Yearly Salaries **</b>	<b>Total PY</b>	<b>Allocated Yearly Salaries</b>
<b>ASD Total</b>	2.36	2.31	157,357.87	not listed	
<b>ED Total</b>	10.21	9.86	921,195.48	6.75	642,537.00
<b>EO (OCC) Total</b>	35	19.5	2,752,232.52	32.72	2,731,928.00
<b>LEG OFF Total</b>	2.35	2.35	157,870.80	not listed	
<b>MLD Total</b>	4.985	4.985	417,893.76	3.61	389,875.00
<b>MSCD Total</b>	13.2	14.45	1,217,584.64	10.7	1,037,417.00
<b>MSOD Total</b>	1.365	3	116,752.20	2.86	190,157.00
<b>OIS Total</b>	8.97	0.4	626,809.21	not listed	
<b>PIO Total</b>	2.41	2.76	188,004.96	not listed	
<b>PTSD Total</b>	23.05	28.1	2,169,626.12	27.2	2,524,136.00
<b>RD Total</b>	34.82	36.37	3,211,375.72	36.87	3,293,387.00
<b>SSD Total</b>	47.41	57.16	4,205,069.55	59.49	5,277,371.00
<b>Totals across all divisions</b>	<b>186.13</b>	<b>181.245</b>	<b>16,141,772.83</b>	<b>180.2</b>	<b>16,086,808</b>
<b>Excluding ASD, LEG OFF, OIS and PIO*</b>	<b>170.04</b>	<b>173.425</b>	<b>15,011,729.99</b>	<b>180.2</b>	<b>16,086,808</b>
<b>Totals for Excluded ASD, PIO, LEG OFF and OIS *</b>	<b>16.09</b>	<b>7.82</b>	<b>1,130,042.84</b>		
* These divisions are not listed on the 5-27 spreadsheet and according to the May 8 staff report were included in the amount calculated as "Administrative Overhead"					
** Annual allocated amounts are consistent with initial PY estimates and appear not to have been adjusted to reflect revised estimated PY.					

# **Appendix D**

**Comparisons of Contract Totals for Different Documents in the Acquired Expenditure Data with Contract Totals on Tables 3a and 4a**

**Table D-1: Contracts FY 2007-08**

Contract Referenced		Bates #						Comments/Notes
Contract #	Service	Pg 000454	Pg 000150	Pg 000025	Pg 000007	Pg 000026	Pg 000136	
07-107	Management & Tech Support Participating in WCI	89,000	89,000				89,000	
07-111	Meeting & event support for AB 32 implementation	48,438	48,438				48,438	
07-114	Web design for climate web pages	55,160	5,500				49,660 listed in FY 08-09 (000150)	
06-744	Evaluation and validation of CO2 estimates of EMFAC and OFFROAD through Vehicle Activity Analysis	400,000	0				400,000 listed in FY 06-07 (000150); term listed is FY 06-07 through 08-09 (000136)	
05-736	GIS Based California Locomotives Emissions Inventory						term listed is FY 05-06 through 08-09 (000136)	
06-726	CCAR Protocol	586,700	586,700	290,000	586,000	586,000	term listed is FY 06-07 through 08-09 (000136)	
07-723	Growth Surrogates for GHG Emissions	250,000	0		250,000	250,000	not received as of 4/28/09 (000150)	
07-716	Conduct review of modeling studies of the impacts of transit, land use and pricing strategies on vehicle travel and GHG emissions; coordinate associated workshops	194,500	100,046		194,000	194,500	100,045 listed in FY 08-09 (000150)	
07-719	Development of GHG tool	249,900	249,900	250,000	250,000	250,000		
07-722	Technical Analysis re: GHG Reduction (oil & gas sector)	60,000	60,000	60,000	60,000	60,000		
07-729	Training for Independent verifiers of GHG Reporting	200,000	200,000	200,000	200,000	200,000		
07-304	Climate Change Scenarios	191,553	134,087				31,311 and 19,155 listed in FY 08-09 and 09-10, respectively (000150)	
07-322	Retail Climate Change Mitigation	265,144	185,601				53,029 and 26,514 listed in FY 08-09 and 09-10, respectively (000150)	
07-324	Employee Loan from EPA - advise on climate change	90,336	90,336				90,336	

**Table D-1: Contracts FY 2007-08**

Contract Referenced		Bates #						Comments/Notes
Contract #	Service	Pg 000454	Pg 000150	Pg 000025	Pg 000007	Pg 000026	Pg 000136	
07-326	Support for AB 32 Committee	4,999	4,999				4,999	59,553 and 29,776 listed in FY 08-09 and 09-10, respectively (000150)
07-330	Destruction of Ozone Depleting	297,765	208,436				297,765	
07-334	Provide technical assistance re: Scoping Plan	49,936	49,936				49,935	term is FY 08-09/09-10 (000454); 125,659 and 62,829 listed in FY 08-09 and 09-10, respectively (000150); term listed is FY 08-09/09-10 (000136)
07-344	California Carbon Footprint Calculator	628,292	439,805				628,292	
07-347	Technical writing and support for the CA climate change	47,110	42,110				47,110	5,000 listed in FY 08-09 (000150)
07-405	Low Carbon Fuel Standard	238,453	238,453				238,453	
SA 07-4001	Low Carbon Fuel Standard	4,995	0				4,995	
07-419	Goods Movement - Hybrid Tug Testing	150,000	150,000				150,000	
07-409	Low Carbon Fuel Standard	350,000	350,000				350,000	
SA 07-4002	Sponsor Low Carbon Fuel Standard Conference	5,000	0				5,000	
07-418	Multimedia Analysis for Biodiesel	100,000	100,000				100,000	
07-417	Multimedia Analysis for Biodiesel	100,000	100,000				100,000	
07-404	Low Carbon Fuel Standard	100,000	100,000				100,000	
07-407	Advanced Vehicles	100,000	100,000				100,000	
07-312	Ozone Depleting Substance	349,758	244,830					69,952 and 34,976 listed in FY 08-09 and 09-10, respectively (000150)
07-313	Inventory Applications of Perfluorocarbons	199,840	99,920					79,936 and 19,984 listed in FY 08-09 and 09-10, respectively (000150)
07-319	Vehicle Emissions	22,500						
07-321	Evaluation of Efficiency Activities	100,000	70,000					20,000 and 10,000 listed in FY 08-09 and 09-10, respectively (000150)
07-341	Environmental Justice and Climate Change Report	50,000	45,000					5,000 listed in FY 08-09 (000150)

**Table D-1: Contracts FY 2007-08**

Contract Referenced		Bates #						Comments/Notes
Contract #	Service	Pg 000454	Pg 000150	Pg 000025	Pg 000007	Pg 000026	Pg 000136	
07-348	Energy 2020 Integrated Multi-Region Energy Model - All Fuel Demand Sector Simulations	200,000	140,000					40,000 and 20,000 listed in FY 08-08 and 09-10, respectively
R07-349	Support for Haagen-Smit Symposium	25,000	0					
<b>TOTAL</b>		<b>5,804,379</b>	<b>4,233,097</b>	<b>800,000</b>	<b>1,540,000</b>	<b>1,346,000</b>	<b>5,017,695</b>	000025 is total for PTSD contracts only
Contracts total reflected in 3a (FY 07-08):		<b>\$4,652,429</b>						

**Table D-2: Contracts FY 2008-09**

Contract Referenced		Bates #			Comments/Notes
Contract #	Service	Pg 000150	Pg 000450-452	Pg 002031-2042*	
07-114	Web design for climate web pages	49,660			All contracts listed in Bates # 000150 for FY 08-09 are contracts with 07 prefixes (presumably initiated or approved in FY 07-08); these contracts do not appear in other lists of FY 2008-09 contract expenditures, even though Bates #000450-452 does note two additional 07-prefixed contracts that were awarded additional monies.
07-716	Conduct review of modeling studies of the impacts of transit, land use and pricing strategies on vehicle travel and GHG emissions; coordinate associated workshops	100,045			
07-304	Climate Change Scenarios	31,311			
07-322	Retail Climate Change Mitigation	53,029			
07-330	Destruction of Ozone Depleting	59,553			
07-344	California Carbon Footprint Calculator	125,659			
07-347	Technical writing and support for the CA climate change	5,000			
07-312	Ozone Depleting Substance	69,952			
07-313	Inventory Applications of Perfluorocarbons	79,936			
07-321	Evaluation of Efficiency Activities	20,000			
07-341	Environmental Justice and Climate Change Report	5,000			
07-348	Energy 2020 Integrated Multi-Region Energy Model - All Fuel Demand Sector Simulations	40,000			
08-104	Public meetings and workshops		399,447	399,447	
08-105	Western Climate Initiative Contribution		178,000	178,000	
07-114-1	extra funding		10,000		to Symsoft
08-752	Development of Inventory		-		This contract for \$175,000 is noted as "not related" to AB 32 (000450)
08-755	Software Customization of GHG mandatory reporting tool		249,900	249,900	
08-761	Updates to ARB's Wildland Fire Emission Estimation System software application		96,000	96,000	
08-763	coding and analytical services on the EMFAC/OFFROAD models		45,000	45,000	Total contract amount listed is \$300,000 (on both 000450 and 002041) but contract is designated as "15% related" to AB 32 (000450)
08-765	continued development of GHG reporting tool software application		249,900		This contract, like 08-755, is with Perrin Quarles Associates.

**Table D-2: Contracts FY 2008-09**

Contract Referenced		Bates #			Comments/Notes
Contract #	Service	Pg 000150	Pg 000450-452	Pg 002031-2042*	
07-716-1	additional funds		94,600		It is unclear whether this should be regarded as the same contract as 07-716, above, which also went to UC Berkeley and which was an FY 07-08 contract for which funds were listed as encumbered in FY 08-09 (000150), or if this is actually money in addition to that contract's stated total amount of 194,500.
08-303	Cool Communities		350,000	350,000	
08-301	Climate Change web portal consultant		4,950	4,950	
08-309	Participate in California Green Dream Expo		4,999	4,999	
08-311	Behavior Energy and Climate Change		4,950		
08-312	conference (UC Davis)		796,641	796,641	000450 notes that this contract is for research into feebates for the Scoping Plan
08-313	review of climate change research efforts		15,000	15,000	
08-314	assistance to develop a cool community project in support of AB 32		350,000	350,000	
08-320	evaluation of Refrigerant Recovery from Shipping Containers		110,000	110,000	
08-323	Understanding of particle radiative forcing emitted from Combustion sources		187,500	187,500	Total contract amount listed is \$750,000 (on both 000451 and 002042) but 000451 notes that "25% could be related to AB 32"
08-324	Assessment of Baseline Nitrous Oxide Emissions		300,000	300,000	
08-325	Behavioral Determinants of Home Energy Consumption		250,000	250,000	
R-08-329	COC's from agricultural soil fumigation		-		Contract listed is for \$50,000 but note says it is not funded by ARB and is not AB 32 related
08-330	CA Commercial End-Use Survey Data Review		4,940	4,940	Re: AB 32 related-ness, document 000451 says "left a message"
08-331	Economic Effects of Climate Change Strategies		48,425	48,425	
R-08-332	Support ARB's 2009 Haagen-Smit Symposium		25,000	25,000	
08-333	develop/create a five minute feature for a show titled "Our Planet"		19,700	19,700	

**Table D-2: Contracts FY 2008-09**

Contract Referenced		Bates #			Comments/Notes
Contract #	Service	Pg 000150	Pg 000450-452	Pg 002031-2042*	
08-334	Analysis of Emissions Data from transport systems		49,000		Re: AB 32 related-ness, document 000451 says "left a message"
08-335	Greenhouse Gas Performance Analysis for Commercial Buildings		125,000		
08-337	2009 Haagen-Smit Symposium		80,000		
08-338	Survey of Small Businesses		16,000		
07-324-2	additional cost		33,480		Re: AB 32 related-ness, document 000452 says "left a message"
08-408	Developing California Low Carbon Fuel Standard		413,000	413,000	
08-410	Impacts on California economy		300,354	300,354	
08-411	contractor will host the web application		-		Contract listed is for \$347,000 but note says it is not AB 32 related
08-418	emissions tests between diesel fuel and various blends of biodiesel fuels		50,000	50,000	
R-08-419	emissions tests between diesel fuel and various blends of biodiesel fuels		50,000	50,000	
<b>Total</b>		<b>639,145</b>	<b>4,911,786</b>	<b>4,248,856</b>	
<b>Contracts total reflected in 4a (FY 08-09): \$5,900,000</b>					

\* These pages list all ARB and Cal/EPA contracts approved or "in process" as of 3-17-09 and do not designate which of them are AB 32 related. Thus, we have used this list only to examine the consistency of amounts for the 2008 contracts listed in Bates #000450-000452, which are designated as AB 32 related (except where corrections or adjustments are noted).

# **Appendix E**

## **The Intermediate Product**

Ochoa, Patricia@ARB

---

**From:** Chang, Edie@ARB  
**Sent:** Monday, May 04, 2009 4:29 PM  
**To:** Costantino, Jon@ARB  
**Subject:** Fwd: ARB CC Staffing Resources FY07-08 for assignment PMI.xls

**Attachments:** ARB CC Staffing Resources FY07-08 for assignment PMI.xls



ARB CC Staffing  
Resources FY07...

Sent via my ARB Verizon Centro™

-----Original Message-----

**From:** "Anderson, Sharon (OCC)@ARB" <shanders@arb.ca.gov>  
**Subj:** ARB CC Staffing Resources FY07-08 for assignment PMI.xls  
**Date:** Mon May 4, 2009 3:55 pm  
**Size:** 43 bytes  
**To:** "Chang, Edie@ARB" <echang@arb.ca.gov>

Deleted Judy and added Lisa Holm instead.

CLASS	CLASS FID	NAME	DIV	Monthly SA	% OF TIME	Revised %	ALLOCATION	Position
AIR POLLUTION SPEC		MACUMBE	LEG OFF	5492	0.85	0.85	4668.2	1
AIR POLLUTION SPEC		VLASEK,	C LEG OFF	6583	0.65	0.65	4278.95	1
AIR POLLUTION SPEC		DALLAS,	F PIO	7214	0.5	0.5	3607	1
AIR POLLUTION SPEC		SWANTON	PIO	7214	0.25	0.25	1803.5	1
AIR POLLUTION SPEC		SCHILLA,	RD	4674	0.7	0.9	4206.6	1
Air Pollution Spec Total								
ASSOC BUS MNGT A		PILE,	LYNI ASD	5094	0		0	1
ASSOC BUS MNGT A		SANCHEZ	ASD				0	1
Assoc Business Mgt Analyst Total								
ASO GOVRL PROG A		CHAVEZ,	I PIO				0	1
ASO GOVRL PROG A		STANICH,	PIO	5348	0.15	0.15	802.2	1
ASO GOVRL PROG A		HARVEY,	I ASD	5348	0.05	0.05	267.4	1
ASO GOVRL PROG A		KRAMER,	ASD	5348	0.06	0.06	320.88	1
ASO GOVRL PROG A		MACIAS,	L ASD	5093	0.12	0.12	611.16	1
Assoc Govtl Prog Analyst Total								
ASO PERSONNEL AN		BOLLINGE	ASD	3322	0.07	0.07	232.54	1
ASO PERSONNEL AN		BRENNAN	ASD	4620	0.13	0.13	600.6	1
ASO PERSONNEL AN		LOVELES	ASD	4446	0.1	0.1	444.6	1
Assoc Personnel Analyst Total								
BUS SVS A SP		GOMEZ,	A ASD	3644	0.2	0.2	728.8	1
BUSNS SVS A SP		GALVEZ,	I ASD				0	1
Business Service Asst-Spec Total								
BUS SVS O II/SP		MCALISTE	ASD	4427	0		0	1
Business Service Officer II-Spec Total								
C.E.A.		GOLDSTE	EO (OCC)	11969	0.75	0.25	2992.25	1
C.E.A.		STEPHAN	ASD	10520	0.15		0	1
C.E.A.		BROOKS,	ASD	7838	0.01	0.01	78.38	1
C.E.A. I Total								
COMMUNICATIONS I		KAY,	LEO PIO	9190	0.4		0	1
Communications Director Total								
EXEC A		MASSEY,	I PIO	3779	0.25	0.25	944.75	1
Exec Asst Total								
INFORMATN OFFCR		PAAUWE,	PIO	6409	0.15	0.15	961.35	1
INFORMATN OFFCR		YOUNG,	S PIO	6409	1	1	6409	1
Info Officer II Total								
INF OF I/SP		CAESAR,	I PIO				0	1
Info Officer I-Spec Total								
OFF TECH (TYPING)		CHOUDHA	ASD	1343	0.2	0.2	268.6	1
Office Techn-Typing Total								
PERSNL SP		COLBERT	ASD				0	1
PERSNL SP		TAMBURC	ASD	2993	0.03	0.03	89.79	1
Pers Spec Total								
SECRETARY		GAPAS-JA	PIO	3265	0.01	0.01	32.65	1
Secretary Total								
SR INFO SYS AN/SP		LUNA,	DAI ASD	6788	0.02	0.02	135.76	1
Sr Info Systems Analyst-Spec Total								
STAFF SER AN (GEN		PADDOCK	LEG OFF	3658	0.95	0.95	3475.1	1
STAFF SER AN (GEN		DARRING	ASD	3893	0.06	0.06	233.58	1
STAFF SER AN (GEN		PARKER,	I ASD				0	1
STAFF SER AN (GEN		ESPINOZA	ASD				0	1
Staff Services Analyst-Gen Total								

STAFF SVS MANGER HOLLINGS ASD	5897	0.03	0.03	176.91	1
STAFF SVS MANGER BRUNKHC ASD				0	1
STAFF SVS MANGER GARCIA, J ASD	5855	0.3	0.3	1756.5	1
STAFF SVS MANGER SIMMONS ASD	5615	0.05	0.05	280.75	1
Staff Services Mgr I Total					
STAFF SVS MGR III TANIMOT(ASD				0	1
STAFF SVS MGR III WATKINS, ASD	7163	0.2	0.2	1432.6	1
Staff Services Mgr III-Supvry Total					
STF SVS MGR II/SUP DEL TORC ASD	6602	0.04	0.04	264.08	1
Staff Services Mgr II-Supvry Total					
STAFF SER AN (GEN STERLING EO (OCC)	3599	1	1	3599	1
Staff Services Analyst-Gen Total					
AIR POLUTION SPEC ESLINGER PTSD	6237	0.75	0.75	4677.75	1
AIR POLUTION SPEC HALM, CH PTSD	7214	0.25	0.25	1803.5	1
AIR POLUTION SPEC SCOTT, KI PTSD	3435	0.75	0.75	2576.25	1
AIR POLUTION SPEC SPENCER PTSD	6724	0.75	0.1	672.4	1
AIR POLUTION SPEC LI, LINYIN PTSD	7214	0.5	0.5	3607	1
AIR POLUTION SPEC VAYSSIER PTSD	6455	0.95	0.95	6132.25	1
AIR POLUTION SPEC LOWERY, PTSD	5924	1	1	5924	1
AIR POLUTION SPEC HAMBLET PTSD	6907	1	1	6907	1
AIR POLUTION SPEC MOSHER, PTSD	6237	1	1	6237	1
AIR POLUTION SPEC OLIVER, C PTSD	5712	1	1	5712	1
AIR POLUTION SPEC SAHOTA, I PTSD	7214	1	1	7214	1
AIR POLUTION SPEC ERSKINE, PTSD	6493	0.04	0.04	259.72	1
AIR POLUTION SPEC MAGBUHA PTSD	7214	0		0	1
AIR POLUTION SPEC PETATE, E PTSD	3903	0.25	0.25	975.75	1
AIR POLUTION SPEC DANG, CO PTSD	7214	0.25	0.25	1803.5	1
AIR POLUTION SPEC SARDAR, PTSD	5940	0.1	0.1	594	1
AIR POLUTION SPEC ALEXIS, AI PTSD	7214	0.1	0.1	721.4	1
AIR POLUTION SPEC DOLNEY, I PTSD	5940	0.3	0.3	1782	1
AIR POLUTION SPEC LIVINGSTON PTSD	5940	0.2	0.2	1188	1
Air Pollution Spec Total					
AIR RES ENG LUTTER, I PTSD	6270	1	1	6270	1
AIR RES ENG BURMICH, PTSD	6012	1	1	6012	1
AIR RES ENG LAWVER, PTSD	6214	1	1	6214	1
AIR RES ENG DUGYON, PTSD	5049	0.3	0.3	1514.7	1
AIR RES ENG HANCOCK PTSD	7617	0.34	0.34	2589.78	1
AIR RES ENG SHAMASU PTSD	7214	0.3	0.3	2164.2	1
AIR RES ENG FUTABA, I PTSD	7214	0.05	0.05	360.7	1
AIR RES ENG DAI, ZHEN PTSD	6237	0.25	0.25	1559.25	1
AIR RES ENG JAW, SHY PTSD	6549	0.15	0.15	982.35	1
AIR RES ENG MALCHOV PTSD	5914	0.5	0.5	2957	1
AIR RES ENG YOON, SE PTSD	6549	0.5	0.5	3274.5	1
Air Resources Engr Total					
AIR RES SUP I SHIMP, DA PTSD	8965	0.5	0.5	4482.5	1
AIR RES SUP I TASAT, W PTSD	8965	0.95	0.95	8516.75	1
AIR RES SUP I THOMPSC PTSD	8965	1	1	8965	1
AIR RES SUP I TAYLOR, J PTSD	8609	0.1	0.1	860.9	1
AIR RES SUP I LONG, JEF PTSD	8965	0.05	0.05	448.25	1
AIR RES SUP I SAX, TODI PTSD	8813	0.1	0.1	881.3	1
Air Resources Supvr I Total					
AIR RES SUP II BODE, RIC PTSD	9842	0.75	0.75	7381.5	1

AIR RES SUP II	BENJAMIN PTSD	9842	0.1	0.1	984.2	1
Air Resources Supvr II Total						
C.E.A.	MURCHIS PTSD	10856	0.5		0	1
C.E.A. I Total						
STF AR POL SP	HUNSAKE PTSD	7617	0.95	0.95	7236.15	1
STF AR POL SP	GAFFNEY PTSD	8249	1	1	8249	1
STF AR POL SP	ZHOU, LEI PTSD	8054	0.2	0.2	1610.8	1
Staff Air Pollution Spec Total						
AIR POLLUTION SPE	Blackburn, EO (OCC)				0	1
AIR POLLUTION SPE	Gray, Jenn EO (OCC)				0	1
AIR POLLUTION SPE	Knox, Bill EO (OCC)				0	1
AIR POLLUTION SPE	Davis, Che EO (OCC)				0	1
AIR POLLUTION SPE	Willmon, T EO (OCC)				0	1
AIR POLLUTION SPEC	FARR, MA EO (OCC)	5997	1	1	5997	1
AIR POLLUTION SPEC	HART, GEI EO (OCC)	6909	1	1	6909	1
AIR POLLUTION SPEC	KHAMOU, EO (OCC)	6548	1	1	6548	1
AIR POLLUTION SPEC	RAYMOND EO (OCC)	6875	1	1	6875	1
AIR POLLUTION SPEC	BLAKESLEE EO (OCC)	6904	1	1	6904	1
AIR POLLUTION SPEC	DONHOWIE EO (OCC)	3903	1	1	3903	1
AIR POLLUTION SPEC	DUVALL, FEO (OCC)	6871	1	1	6871	1
AIR POLLUTION SPEC	TUTER, B FEO (OCC)	7214	1	1	7214	1
AIR POLLUTION SPEC	MIYASATCRD	6549	0.35	0.35	2292.15	1
AIR POLLUTION SPEC	ROGERS, PTSD	6549	0.75	0.75	4911.75	1
Air Pollution Spec Total						
AIR RES ENG	Nottoli, Juc EO (OCC)				0	1
AIR RES ENG	WITHYCO PTSD	7291	0		0	1
AIR RES ENG	KALANDIY PTSD			0.15	0	1
AIR RES ENG	KRISHNAM PTSD				0	1
Air Resources Engr Total						
AIR RES SUP I	ANDERSON EO (OCC)	7954	1	1	7954	1
AIR RES SUP I	COSTANT EO (OCC)	8769	1	1	8769	1
AIR RES SUP I	TRAN, HIERD	8597	0.1	0.1	859.7	1
AIR RES SUP I	OEY, SYL PTSD				0	1
Air Resources Supvr I Total						
AIR RES SUP II	CHANG, E EO (OCC)	9842	1	1	9842	1
AIR RES SUP II	KENNEDY EO (OCC)	8097	1	1	8097	1
Air Resources Supvr II Total						
ASO GOVRL PROG A	ATKINSON EO (OCC)	4689	1	1	4689	1
Assoc Govtl Prog Analyst Total						
C.E.A.	SHULOCK EO (OCC)	10456	1	1	10456	1
C.E.A. I Total						
EXEC A	Smith, San EO (OCC)				0	1
OT (T) / EXEC A	MAHER, R EO (OCC)	2686	1	1	2686	1
Exec Asst Total						
OFF TECH (TYPING)	Seghers, C EO (OCC)				0	1
Office Techn-Typing Total						
STF AR POL SP	VARENCH EO (OCC)	8249	1	1	8249	1
Staff Air Pollution Spec Total						
AIR POLLUTION SPE	Bamberger EO (OCC)				0	1
AIR POLLUTION SPE	Coombs, N EO (OCC)				0	1
AIR POLLUTION SPE	Fuji, Mihoy EO (OCC)				0	1
AIR POLLUTION SPE	Mattu, Mar EO (OCC)				0	1

AIR POLLUTION SPE Olsson, Ra EO (OCC)				0	1
AIR POLLUTION SPE Orlando, C EO (OCC)				0	1
AIR POLLUTION SPE Zaragoza, EO (OCC)				0	1
AIR POLUTION SPEC AGUILA, B EO (OCC)	4674	1	1	4674	1
AIR POLUTION SPEC PRESTON ED	7214	0.66	0.66	4761.24	1
AIR POLUTION SPEC SIMANGAI ED	5252	0.66	0.66	3466.32	1
AIR POLUTION SPEC SPREADB ED	5964	0.3	0.3	1789.2	1
AIR POLUTION SPEC O'CONNOR ED	6549	0.5	0.5	3274.5	1
AIR POLUTION SPEC RATLIFF, ED	4908	0.15	0.15	736.2	1
AIR POLUTION SPEC MORA, HC ED	7314	0.02	0.02	146.28	1
AIR POLUTION SPEC ROSS, CH ED				0	1
AIR POLUTION SPEC BERGHOL ED	7214	0.01	0.01	72.14	1
AIR POLUTION SPEC GERGEN, ED	7214	0.03	0.03	216.42	1
AIR POLUTION SPEC BARBER, J ED	7214	0.05	0.05	360.7	1
AIR POLUTION SPEC OFFER, R ED				0	1
AIR POLUTION SPEC BOWERS, RD	7214	1	1	7214	1
AIR POLUTION SPEC CHOW, Y RD	5940	0.42	0.42	2494.8	1
AIR POLUTION SPEC GALLAGHER RD	5997	0.6	0.6	3598.2	1
AIR POLUTION SPEC SEIDLER, RD	7214	0.42	0.42	3029.88	1
AIR POLUTION SPEC BAYTHAVI RD	4674.02	0		0	0.75
AIR POLUTION SPEC LEEMAN, I RD	6871	1	1	6871	1
AIR POLUTION SPEC ADILI, KA RD	6774	0.2	0.2	1354.8	1
AIR POLUTION SPEC BOCK, CO RD	6762	0.3	0.3	2025.6	1
AIR POLUTION SPEC CHEN, BE RD	4908	0.3	0.3	1472.4	1
AIR POLUTION SPEC KENNEDY RD	7214	0.8	0.8	5771.2	1
AIR POLUTION SPEC SHELBY, ER RD	4908	1	1	4908	1
AIR POLUTION SPEC STORELLI RD	6777	0.2	0.2	1355.4	1
AIR POLUTION SPEC PAPKE, D RD	6497	0.5	0.9	5847.3	1
AIR POLUTION SPEC GARCIA, C RD	7314	0.01	0.01	73.14	1
AIR POLUTION SPEC GILBREAT RD	6595	0		0	1
AIR POLUTION SPEC JAREEN, I RD	5153	0		0	1
AIR POLUTION SPEC YAP, POH RD	5940	0		0	1
AIR POLUTION SPEC ALVARADO RD	7214	0.1	0.1	721.4	1
AIR POLUTION SPEC AUSTIN, JI RD	7214	0	0	0	1
AIR POLUTION SPEC HSU, YING RD	6548	1	1	6548	1
AIR POLUTION SPEC JAKOBER, RD	6549	0.95	0.95	6221.55	1
AIR POLUTION SPEC MARA, STI RD	7214	0.25	0.25	1803.5	1
AIR POLUTION SPEC SCHEEHLI RD	7214	1	1	7214	1
AIR POLUTION SPEC JOHNSON SSD	6549	0.1	0.1	654.9	1
AIR POLUTION SPEC KIGER, JE SSD	6777	0.3	0.3	2033.1	1
AIR POLUTION SPEC NAJJAR, T SSD	7214	0.1	0.1	721.4	1
AIR POLUTION SPEC KOMLENK SSD	7214	0.2	0.2	1442.8	1
AIR POLUTION SPEC VILLALOBOS SSD	6549	0.3	0.3	1964.7	1
AIR POLUTION SPEC ADAMS, N SSD	7214	0.25	0.25	1803.5	1
AIR POLUTION SPEC LEE, STEF SSD	6237	0.3	0.3	1871.1	1
AIR POLUTION SPEC LEYVA, LL SSD	3903	0.2	0.2	780.6	1
AIR POLUTION SPEC PENFIELD SSD				0	1
AIR POLUTION SPEC TRENDSCH SSD	7214	1	1	7214	1
AIR POLUTION SPEC YEUNG, L' SSD	7214	1	0.67	4833.38	1
AIR POLUTION SPEC LOCKE, JI SSD	6549	0.55	0.55	3601.95	1
AIR POLUTION SPEC ANDERSON SSD	4452	0.4	0.4	1780.8	1
AIR POLUTION SPEC JOHNSTON SSD	3903	0.4	0.4	1561.2	1

AIR POLLUTION SPEC SUTHERL, SSD	6875	0.3	0.3	2062.5	1	
AIR POLLUTION SPEC COLLOD, SSD	6168	0.8	0.8	4934.4	1	
AIR POLLUTION SPEC GARCIA, I, SSD	7214	0.8	0.8	5771.2	1	
AIR POLLUTION SPEC POMALES, SSD	7214	0.1	0.1	721.4	1	
AIR POLLUTION SPEC ALTMAN, I, SSD	1442	0.1	0.1	144.2	1	
AIR POLLUTION SPEC POWERS, SSD	3925	0.2	0.2	785	1	
AIR POLLUTION SPEC WELLER, I, SSD	4674	0.5	0.5	2337	1	
AIR POLLUTION SPEC YAMASHITA, SSD	4674	0.5	0.5	2337	1	
AIR POLLUTION SPEC DIAMOND, SSD	7214	0.01	0.01	72.14	1	
AIR POLLUTION SPEC SPRANGE, SSD	903	0.01	0.01	9.03	1	
AIR POLLUTION SPEC SUROVIK, SSD	5771	0.05	0.05	288.55	1	
AIR POLLUTION SPEC STEBBINS, SSD	7214	0.5	0.5	3607	1	
AIR POLLUTION SPEC VIOLET, A, SSD	4674	0.5	0.5	2337	1	
AIR POLLUTION SPEC LING-TAYI, SSD				0	1	
AIR POLLUTION SPEC LOZO, CA, SSD	3779	0.95	0.95	3590.05	1	
AIR POLLUTION SPEC WERNER, SSD				0	1	
AIR POLLUTION SPEC CASTANEI, SSD	3903	0.05	0.05	195.15	1	
AIR POLLUTION SPEC GLABE, AI, SSD	5997	1	1	5997	1	
AIR POLLUTION SPEC INGRAM, I, SSD	7063	1	1	7063	1	
AIR POLLUTION SPEC LORESTA, SSD	6817	1	1	6817	1	
AIR POLLUTION SPEC SINGH, M, SSD				0	1	
AIR POLLUTION SPEC SOLARZ, I, SSD				0	1	
AIR POLLUTION SPEC BAKER, FI, MSCD	5411	0.2	0.2	1082.2	1	
AIR POLLUTION SPEC SPENCER, MSCD				0	1	
AIR POLLUTION SPEC CHEN, DA, MSCD	7064	0.5	0.5	3532	1	
AIR POLLUTION SPEC PINTAR, H, MSCD	5997	1	1	5997	1	
AIR POLLUTION SPEC LIVINGSTON, PTSD	6237	0.75	0.75	4677.75	1	
AIR POLLUTION SPEC PANEK, JE, PTSD	4990	1	1	4990	1	
AIR POLLUTION SPEC DICARLO, PTSD	7214	0.25	0.25	1803.5	1	
AIR POLLUTION SPEC KIMURA, I, PTSD	1582	0.75	0.75	1186.5	1	
Air Pollution Spec Total				0	1	
AIR RES ENG	WADE, SA EO (OCC)			0	1	
AIR RES ENG	MCCORM/ED	7214	0.66	0.66	4761.24	1
AIR RES ENG	CHURCH, RD	7617	0.65	0.65	4951.05	1
AIR RES ENG	PARK, SE, RD	5940	0		0	1
AIR RES ENG	DEAN, JEE, SSD	6237	0.1	0.1	623.7	1
AIR RES ENG	CHOWDHI, SSD	7617	0.2	0.1	761.7	1
AIR RES ENG	FONG, SU, SSD	6871	0.3	0.3	2061.3	1
AIR RES ENG	FISCHER, SSD	7214	0.2	0.2	1442.8	1
AIR RES ENG	HURLEY, I, SSD	7214	0.1	0.1	721.4	1
AIR RES ENG	MAYEUR, SSD	4899	1	0.58	2841.42	1
AIR RES ENG	MROWKA, SSD	4899	1	1	4899	1
AIR RES ENG	SIROKY, I, SSD	7258	1	0.58	4209.64	1
AIR RES ENG	PATTON, I, SSD	7617	0.55	0.55	4189.35	1
AIR RES ENG	AHUJA, K, SSD	7214	0.2	0.2	1442.8	1
AIR RES ENG	ORIEL, AR, SSD	4279	0.1	0.1	427.9	1
AIR RES ENG	DOLL, JEF, SSD	5940	0.2	0.2	1188	1
AIR RES ENG	FOSTER, I, SSD	4279	0.01	0.01	42.79	1
AIR RES ENG	RODERICI, SSD	6270	0.1	0.1	627	1
AIR RES ENG	ROGEN, R, SSD	7214	0.1	0.1	721.4	1
AIR RES ENG	ASREGAD, SSD	7617	0.01	0.01	76.17	1
AIR RES ENG	OINEZA, R, SSD	5940	0.15	0.15	891	1

AIR RES ENG	GHAFFAR SSD	7214	0.01	0.01	72.14	1
AIR RES ENG	TRAN, DU SSD	7214	0.01	0.01	72.14	1
AIR RES ENG	VETTRAIN SSD	7214	0.01	0.01	72.14	1
AIR RES ENG	LEE, LIND, SSD	7617	0.3	0.3	2285.1	1
AIR RES ENG	MCMAHAN SSD				0	1
AIR RES ENG	SIDECO, A SSD	4899	0.1	0.1	489.9	1
AIR RES ENG	SIDECO, K SSD	4899	0.05	0.05	244.95	1
AIR RES ENG	CAYABYA SSD	6549	0.05	0.05	327.45	1
AIR RES ENG	GUTHRIE, SSD	7617	0.05	0.05	380.85	1
AIR RES ENG	OBRIEN, C SSD				0	1
AIR RES ENG	PRABHU, S SSD	7214	1	1	7214	1
AIR RES ENG	PHAM, CH SSD	7214	1	1	7214	1
AIR RES ENG	BLOUDEF SSD	7214	0.05	0.05	360.7	1
AIR RES ENG	CLEARY, T SSD	7214	1	1	7214	1
AIR RES ENG	ZHANG-TI SSD	6956	1	1	6956	1
AIR RES ENG	O'CONNOR MSCD				0	1
AIR RES ENG	YANG, LI MSCD	7617	0.2	0.2	1523.4	1
AIR RES ENG	MACIAS, K MSCD	7214	0.3	0.3	2164.2	1
AIR RES ENG	BISHNU, L MSCD				0	1
AIR RES ENG	HAWELTI, MSCD	7617	0.85	0.85	6474.45	1
AIR RES ENG	KYRIACOL PTSD	6871	0.25	0.25	1717.75	1
Air Resources Engr Total						
AIR FLD REP II	ABDUL-KA ED				0	1
AIR FLD REP II	ALATORRI ED				0	1
AIR FLD REP II	ANDUJAR, ED				0	1
AIR FLD REP II	ARMENTA ED				0	1
AIR FLD REP II	BUENROS ED				0	1
AIR FLD REP II	LEON, PAI ED				0	1
AIR FLD REP II	WATKINS, ED				0	1
AIR FLD REP II	SIRAKI, R/ ED				0	1
Air Resources Field Rep II Total						
AIR FLD REP III	YANG, CH ED				0	1
Air Resources Field Rep III Total						
AIR RES SUP I	Cliff, Steve EO (OCC)				0	1
AIR RES SUP I	VAN OMM EO (OCC)	8661	1	1	8661	1
AIR RES SUP I	LEWIS, JU ED	8965	0.66	0.66	5916.9	1
AIR RES SUP I	OCHSNER ED	8965	0.5	0.5	4482.5	1
AIR RES SUP I	BRISBY, S ED	8965	0.1	0.1	896.5	1
AIR RES SUP I	GIORGI, S ED	8965	0.03	0.03	268.95	1
AIR RES SUP I	SMITH, RI ED	8965	0.01	0.01	89.65	1
AIR RES SUP I	SEHGAL, I ED				0	1
AIR RES SUP I	GUPTA, P, RD	7575	0.58	0.58	4393.5	1
AIR RES SUP I	FEIZOLLA RD	8965	0.5	0.5	4482.5	1
AIR RES SUP I	WELLER, IRD	8551	0		0	1
AIR RES SUP I	JENKINS, RD	8965	0.01	0.01	89.65	1
AIR RES SUP I	HERNER, RD	7575	0.4	0.4	3030	1
AIR RES SUP I	MALLORY SSD	8965	0.2	0.2	1793	1
AIR RES SUP I	KRIEGER, SSD	8965	0.3	0.3	2689.5	1
AIR RES SUP I	NYARADY SSD	8965	0.3	0.3	2689.5	1
AIR RES SUP I	COMBS-FI SSD	8154	1	1	8154	1
AIR RES SUP I	AHLUWAL SSD	8965	0.3	0.3	2689.5	1
AIR RES SUP I	MIGUEL, M SSD	8965	0.35	0.35	3137.75	1

AIR RES SUP I	MEHL, DA' SSD	7575	0.6	0.6	4546	1
AIR RES SUP I	HOWARD, SSD	8965	0.1	0.1	896.5	1
AIR RES SUP I	WAUGH, I SSD			0		1
AIR RES SUP I	WONG, TC SSD	8965	0.5	0.5	4482.5	1
AIR RES SUP I	VERGARA SSD			0		1
AIR RES SUP I	LITTAUA, I SSD	8965	0.8	0.8	7172	1
AIR RES SUP I	COURTIS, SSD	8965	1	1	8965	1
AIR RES SUP I	HUGHES, MSCD	8965	0.55	0.55	4930.75	1
AIR RES SUP I	ROWLANE MSCD			0		1
AIR RES SUP I	LEMIEUX, MSCD	8138	0.5	0.5	4069	1
AIR RES SUP I	LEMIEUX, MSCD	8551	0.7	0.7	5985.7	1
AIR RES SUP I	ITO, DOU(PTSD	4068	0.1	0.1	406.8	1
Air Resources Supvr I Total						
AIR RES SUP II	JACOBS, FED	9842	0.18	0.18	1771.56	1
AIR RES SUP II	ANDREON RD	9413	0.5	0.5	4706.5	1
AIR RES SUP II	SMITH, LI RD	9842	0.01	0.01	98.42	1
AIR RES SUP II	FITZGIBB( RD	9413	0.6	0.6	5647.8	1
AIR RES SUP II	FRY, BARI SSD	9842	0.5	0.5	4921	1
AIR RES SUP II	FERNAND SSD	9842	0.1	0.1	984.2	1
AIR RES SUP II	TOLLSTRI SSD	9842	0.2	0.2	1968.4	1
AIR RES SUP II	SIMEROTI SSD	9842	0.8	0.8	7873.6	1
AIR RES SUP II	CARTER, IMSCD	9842	0.3	0.3	2952.6	1
AIR RES SUP II	KARPERO PTSD	9842	0.65	0.65	6397.3	1
Air Resources Supvr II Total						
ASO GOVRL PROG A CLYMER, I SSD		4517	0.05	0.05	225.85	1
Assoc Govtl Prog Analyst Total						
AS INFO SYS AN/SP QUATTRO RD		5403	0.03	0.03	162.09	1
Assoc Info Systems Analyst-Spec Total						
A DIV CH	COREY, R RD	10334	1		0	1
A DIV CH	BARHAM, SSD	10339	0.05		0	1
A DIV CH	ALBU, STE MSCD	10339	0.45	0.45	4652.55	1
Asst Div Chief Total						
C.E.A.	RYDEN, J/ ED				0	1
C.E.A.	CROES, B. RD	10856	0.5		0	1
C.E.A.	FLETCHER SSD	10856	0.3		0	1
C.E.A.	CROSS, R MSCD	10856	0.2	0.2	2171.2	1
C.E.A. I Total						
EXEC A	WETMORI SSD	3996	0.05	0.05	199.8	1
Exec Asst Total						
LIBRARY TECH AST   MORA, MA RD		2695	0.02	0.02	53.9	1
Library Tech Asst I Total						
OFF ASST/GEN	GALINDO, SSD	947	0.05	0.05	47.35	1
Office Asst-Gen Total						
OFF TECH (TYPING) MONTOYA SSD		3264	0.05	0.05	163.2	1
Office Techn-Typing Total						
STF AR POL SP	LUM, DICK ED	8249	0.92	0.92	7589.08	1
STF AR POL SP	OBACK, J ED	8249	0.05	0.05	412.45	1
STF AR POL SP	MAHDAVI, RD	8249	0.1	0.1	824.9	1
STF AR POL SP	PHILLIPS, RD	8249	0.02	0.02	164.98	1
STF AR POL SP	DRECHSL RD	8249	0.08	0.08	659.92	1
STF AR POL SP	DOLISLAG RD	8249	0.1	0.1	824.9	1
STF AR POL SP	LASHGAR RD	8249	0.5	0.5	4124.5	1

STF AR POL SP	HARRIS, C SSD	8249	0.1	0.1	824.9	1
STF AR POL SP	SETIAWAJ SSD	8249	1	1	8249	1
STF AR POL SP	GRUSZEC SSD	8965	0.3	0.3	2689.5	1
STF AR POL SP	GALLENS' SSD	8054	0.2	0.2	1610.8	1
STF AR POL SP	KATO, STI SSD	8249	0.1	0.1	824.9	1
STF AR POL SP	CHIN, GR/ SSD	8249	0.05	0.05	412.45	1
STF AR POL SP	OKAMOTC SSD	8249			0	1
STF AR POL SP	YUAN, JIN SSD				0	1
STF AR POL SP	YANG, EU' SSD	7617	0.05	0.05	380.85	1
STF AR POL SP	CARTER, I MSCD	8249	0.6	0.6	4949.4	1
STF AR POL SP	BEKKEN, I MSCD	4125	1	1	4125	1
STF AR POL SP	SANTOS, , MSCD				0	1
STF AR POL SP	SCHWEHF PTSD	8249	0.5	0.35	2887.15	1
STF AR POL SP	WEIR, JEF PTSD	8249	0.75	0.75	6186.75	1
Staff Air Pollution Spec Total						
STAFF SER AN (GEN	TARBERT, RD	2021	0.01	0.01	20.21	1
Staff Services Analyst-Gen Total						
SUP LIBRARIAN II	HOFFMAN RD	6399	0.05	0.05	319.95	1
Supervising Librarian II Total						
AIR POLUTION SPEC	GUO, LEI RD	6615	0.9	0.9	5953.5	1
AIR POLUTION SPEC	ZHAN, TA/ RD	6237	0.5	0.7	4365.9	1
AIR POLUTION SPEC	CHOI, HE/ RD	3903	0.7	0.7	2732.1	1
AIR POLUTION SPEC	NAUMOFF RD	5940	0.6	0.9	5346	1
AIR POLUTION SPEC	VANCE, W RD	7214	0.05	0.05	360.7	1
AIR POLUTION SPEC	HUANG, Y MLD	7214	1	1	7214	1
AIR POLUTION SPEC	SANDOVA MLD	7214	0.5	0.5	3607	1
AIR POLUTION SPEC	MA, YILIN MLD				0	1
AIR POLUTION SPEC	MIGUEL, A MLD				0	1
AIR POLUTION SPEC	BRANDOV MLD				0	1
AIR POLUTION SPEC	YU, YONG MLD				0	1
AIR POLUTION SPEC	SCOLA, VI MLD				0	1
AIR POLUTION SPEC	ORBANOS MLD				0	1
AIR POLUTION SPEC	MASSETTI MSOD				0	1
AIR POLUTION SPEC	SOTELO, I MSOD	5680	0.1	0.1	568	1
AIR POLUTION SPEC	CHAU, WII MSOD			0.9	0	1
AIR POLUTION SPEC	FUNG, CH MSOD				0	1
AIR POLUTION SPEC	RUNYON, MSOD	7214	0.15	0.05	360.7	1
Air Pollution Spec Total						
AIR RES ENG	COLLINS, RD	7214	0.6	0.7	5049.8	1
AIR RES ENG	POTTS, W RD	7617	0.75	0.9	6855.3	1
AIR RES ENG	FISCHER, RD	7214	0.7	0.7	5049.8	1
AIR RES ENG	GARCIA, A MLD	7214	0.1	0.1	721.4	1
AIR RES ENG	HUO, DAR MLD				0	1
AIR RES ENG	LE, HA T MSOD	7617	0.1	0.1	761.7	1
AIR RES ENG	TRUONG, MSOD				0	1
AIR RES ENG	NGUYEN, MSOD				0	1
AIR RES ENG	NGUYEN, MSOD	7214	0.1	0.1	721.4	1
AIR RES ENG	EVANS, Z/ MSOD				0	1
AIR RES ENG	HADA, STI MSOD				0	1
AIR RES ENG	KIM, SEON MSOD				0	1
AIR RES ENG	MCDUFFE MSOD				0	1
AIR RES ENG	NUKUNYA MSOD				0	1

AIR RES ENG	PAZOKIFA MSOD				0	1
AIR RES ENG	PRYOR, K MSOD				0	1
AIR RES ENG	SALMING MSOD				0	1
Air Resources Engr Total						
AIR RES SUP I	LUO, DON RD	8965	0.5	0.7	6275.5	1
AIR RES SUP I	HUAI, TACRD	7387	0.75	0.7	5170.9	1
AIR RES SUP I	MORA, ANRD	7766	0.85	0.8	6212.8	1
AIR RES SUP I	MCCAULE RD	8965	0.6	0.6	5379	1
AIR RES SUP I	RIEGER, F MLD				0	1
AIR RES SUP I	GILL, KATI MLD				0	1
AIR RES SUP I	CICERO-F MSOD				0	1
AIR RES SUP I	NGUYEN, MSOD	8965	0.05	0.01	89.65	1
Air Resources Supvr I Total						
AIR RES SUP II	AYALA, ALRD	9842	0.75	0.7	6889.4	1
AIR RES SUP II	SUSNOWI MSOD	9842	0.05	0.05	492.1	1
AIR RES SUP II	LOURENC MSOD	9842	0.01	0.01	98.42	1
Air Resources Supvr II Total						
ASO GOVRL PROG A	JORGENS RD	5348	0.3	0.3	1604.4	1
ASO GOVRL PROG A	PLASENCI RD	4278	0.25	0.25	1069.5	1
Assoc Govtl Prog Analyst Total						
AUTO EMN SP II	DUONG, K MSOD	3416	0.15	0.15	512.4	1
AUTO EMN SP II	MOONE, F MSOD	3658	0.15	0.15	548.7	1
Auto Emission Test Spec II Total						
AUTO EMN SP III	CHANG, V MSOD				0	1
AUTO EMN SP III	DIAZ, MAF MSOD				0	1
AUTO EMN SP III	HETTIGOI MSOD			0.33	0	1
AUTO EMN SP III	SORIA, PA MSOD			0.33	0	1
Auto Emission Test Spec III Total						
C.E.A.	HEBERT, J MSOD				0	1
C.E.A. I Total						
INSTRMNT TECH/AR	MARSH, A MLD	4988	0.2	0.2	997.2	1
Instrument Techn Total						
OFF TECH (TYPING)	FONTANA RD	2686	0.25	0.25	671.5	1
OFF TECH (TYPING)	INGRAM, S RD	3125	0.3	0.3	937.5	1
Office Techn-Typing Total						
SPECIAL CONSULTA	DWYER, F RD	4219	0.5	0.6	2531.4	1
Special Consultant Total						
STF AR POL SP	LIVINGSTON RD	8054	0.25	0.5	4027	1
STF AR POL SP	MOTALLEIR RD	8249	0.5	0.7	5774.3	1
STF AR POL SP	PROPPER RD	8249	0.1	0.1	824.9	1
STF AR POL SP	CICERO F RD	8249	0.05	0.5	4124.5	1
STF AR POL SP	SHIMER, I RD	4125	0.8	0.8	3300	1
STF AR POL SP	MALDONA RD	8249	0.05	0.05	412.45	1
STF AR POL SP	PEDERSO RD	8249	0.5	0.5	4124.5	1
STF AR POL SP	VANCURE RD	8249	0.6	0.6	4949.4	1
STF AR POL SP	ZAFONTE, MLD	8249	0.25	0.25	2062.25	1
STF AR POL SP	CHANG, Y MSOD	8249	0.15	0.05	412.45	1
Staff Air Pollution Spec Total						
STAFF SER AN (GEN	BARNETT, RD	2221	0.25	0.25	555.25	1
STAFF SER AN (GEN	BOYER, R RD	3893	0.3	0.3	1167.9	1
STAFF SER AN (GEN	MATHEW S RD	3426	0.25	0.25	856.5	1
Staff Services Analyst-Gen Total						

STAFF SVS MANGER LESTINGLRD	5483	0.2	0.2	1096.6	1
Staff Services Mgr I Total					
AIR POLLUTION SPE WANG, GURD				0	1
AIR POLUTION SPEC WILLIAMS SSD			0.02	0	1
AIR POLUTION SPEC ROSENKR SSD			0.05	0	1
AIR POLUTION SPEC HOUGHTC SSD				0	1
AIR POLUTION SPEC GONZALE SSD				0	1
AIR POLUTION SPEC HAND, RO SSD				0	1
AIR POLUTION SPEC CROOKS, SSD			0.8	0	1
AIR POLUTION SPEC MACGREC SSD			0.5	0	1
AIR POLUTION SPEC RAO, LEEI MSCD				0	1
AIR POLUTION SPEC GABOR, M PTSD				0	1
AIR POLUTION SPEC EDWARDPTSD				0	1
AIR POLUTION SPEC WINEGAR PTSD				0	1
AIR POLUTION SPEC HULBERT, PTSD				0	1
AIR POLUTION SPEC ALI, SAIF OIS			0.2	0	1
Air Pollution Spec Total					
AIR RES ENG LEE, JOHN SSD			0.02	0	1
AIR RES ENG GRANDT, SSD			0.28	0	1
AIR RES ENG WANG, ZI SSD				0	1
AIR RES ENG CRAIG, CA SSD				0	1
AIR RES ENG MANJI, JO SSD				0	1
AIR RES ENG LANG, ZIV SSD				0	1
AIR RES ENG WALTER, SSD				0	1
AIR RES ENG SANCHEZ MSCD				0	1
AIR RES ENG CHEN, JIA RD				0	1
Air Resources Engr Total					
AIR RES SUP I RAINFORI SSD			0.1	0	1
AIR RES SUP I TARICCO, SSD			0.25	0	1
AIR RES SUP I BOYD, RIC SSD			0.25	0	1
Air Resources Supvr I Total					
AIR RES SUP II STOVER, IED	9842		0.05	492.1	1
AIR RES SUP II DONOHOL SSD			0.25	0	1
Air Resources Supvr II Total					
ASO ACCT ANALYST GYURICS, ASD					1
Assoc Acctg Analyst Total					
ASO BUDGET ANALY FORD, LEI ASD					1
Assoc Budget Analyst Total					
AS INFO SYS AN/SP HAYES, LC OIS			0.08	0	1
AS INFO SYS AN/SP HAYES, H/ OIS			0.5	0	1
AS INFO SYS AN/SP CURRAN, OIS	0			0	1
AS INFO SYS AN/SP DEAN, KEI OIS	0			0	1
AS INFO SYS AN/SP PAUL, SU OIS			0.15	0	1
AS INFO SYS AN/SP FALLON, E OIS			0.13	0	1
AS INFO SYS AN/SP MILLER, E OIS			0.17	0	1
AS INFO SYS AN/SP NGUYEN, OIS			0.5	0	1
AS INFO SYS AN/SP NARDELL/ OIS			0.25	0	1
AS INFO SYS AN/SP CRISTOD/ OIS			0.25	0	1
AS INFO SYS AN/SP HEIBECK, OIS			0.18	0	1
AS INFO SYS AN/SP VILLANUE OIS			0.35	0	1
Assoc Info Systems Analyst-Spec Total					
AS PROG ANLYST/SF URQUHAR OIS			0.25	0	1

AS PROG ANALYST/SI KUHN, GLI OIS	0.18	0	1
AS PROG ANALYST/SI DING, RAY OIS	0.2	0	1
Assoc Programmer Analyst-Spec Total			
C.E.A.    WELTY, B I OIS	0.16	0	1
C.E.A. I Total			
DATA PROC MGR III SMALLEY, OIS	0.15	0	1
DATA PROC MGR III NG, HARR OIS	0.15	0	1
DP Mgr III Total			
INFO SYS TC SP II DOOLIN, I OIS	0.07	0	1
Info Systems Techn Spec II Total			
OFF TECH (TYPING) MOSCA, CRD		0	1
Office Techn-Typing Total			
PROGRAMMER II CLARK-SJ OIS	0	0	1
Programmer II Total			
SR INFO SYS AN/SP HALE, VIN OIS	0.2	0	1
SR INFO SYS AN/SP CODDA, C OIS	0.5	0	1
SR INFO SYS AN/SP BUTZ, JUC OIS	0.18	0	1
SR INFO SYS AN/SP FELL, BILL OIS	0.18	0	1
Sr Info Systems Analyst-Spec Total			
SR PROG ANALYST/SI GASTON, OIS	0.25	0	1
Sr Programmer Analyst-Spec Total			
SR PROG ANALYST/SI LEE, SHIU OIS	0.1	0	1
Sr Programmer Analyst-Supvr Total			
STF AR POL SP SUER, CA/SSD	0.2	0	1
STF AR POL SP MILKEY, P SSD	0.2	0	1
STF AR POL SP SORIANO, SSD		0	1
STF AR POL SP DI, PING SSD		0	1
STF AR POL SP HILL, ROD SSD	0.1	0	1
Staff Air Pollution Spec Total			
ST INFO SYS AN/SP PETERSO OIS	0.14	0	1
ST INFO SYS AN/SP COUSER, OIS	0.25	0	1
ST INFO SYS AN/SP MUSCHET OIS	0.2	0	1
ST INFO SYS AN/SP ESPARZA, OIS	0.2	0	1
ST INFO SYS AN/SP SLEDGE, I OIS	0.25	0	1
ST INFO SYS AN/SP DARNELL, OIS	0.13	0	1
ST INFO SYS AN/SP WATKINS, OIS	0.2	0	1
ST INFO SYS AN/SP BLACK, N/ OIS	0	0	1
Staff Info Systems Analyst-Spec Total			
ST PROG ANALYST/SI HOANG, L OIS	0.18	0	1
Staff Programmer Analyst-Spec Total			
STAFF SER AN (GEN GROFF, SIR D		0	1
Staff Services Analyst-Gen Total			
STAFF SVS MANGER SINGH, M/ ASD			1
Staff Services Mgr I Total			
SYS SFTW SP III/S PRZEPIOF OIS	0.15	0	1
Systems Software Spec III-Tech Total			
SYS SFTWR S II/TC KUNS, STI OIS	0.15	0	1
SYS SFTWR S II/TC MAGEE, S OIS	0.15	0	1
Systems Software Spec II-Tech Total			
SYS SF SP I/TECH LEU, DARI OIS	0	0.2	1
ARB TOTAL:		ARB TOTAL:	9032.59 479.75

A= Administration/outreach/support; S= Science; R=Reductions; P=Plan; I= Inve  
Pink Cells need to be filled in by ASD

Systems Software Spec I-Tech Total  
Grand Total

% Used for New Adjus Monthly SA Revised % % OF TIME ANNUAL A Program

0.75	0.75	6117	0.75	0.75	55053 A
0.65	0.65	7568	0.65	0.65	59030.4 A
0.5	0.5	7899	0.5	0.5	47394 A
0.25	0.25	7899	0.25	0.25	23697 A
1	1	5286	1	1	63432 A
	3.15				248606.4 A
0	0	5348		0	0 A
0.02	0.02	5348	0.02	0.02	1283.52 A
	0.02				1283.52 A
0.1	0.1	5248	0.1	0.1	6297.6 A
0.15	0.15	5348	0.15	0.15	9626.4 A
0	0	5348			0 A
0.29	0.29	5348	0.29	0.29	18611.04 A
0	0	5348			0 A
	0.54				34535.04 A
0.04	0.04	3662.4	0.04	0.04	1757.952 A
0.07	0.07	4620	0.07	0.07	3880.8 A
0.05	0.05	4668	0.05	0.05	2800.8 A
	0.16				8439.552 A
0	0				0 A
0.05	0.05	3426	0.05	0.05	2055.6 A
	0.05				2055.6 A
0	0	4427		0	0 A
	0				0 A
0	0	11969		0.5	0 A
0	0	10520		0.15	0 A
0.01	0.01	7838	0.01	0.01	940.56 A
	0.01				940.56 A
0	0	9190		0.35	0 A
	0				0 A
0.25	0.25	3968	0.25	0.25	11904 A
	0.25				11904 A
0.15	0.15	6409	0.15	0.15	11536.2 A
1	1	6409	1	1	76908 A
	1.15				88444.2 A
0.01	0.01	5348	0.01	0.01	641.76 A
	0.01				641.76 A
0.2	0.2	3658	0.2	0.2	8779.2 A
	0.2				8779.2 A
0.09	0.09	3320	0.09	0.09	3585.6 A
0.03	0.03	3253	0.03	0.03	1171.08 A
	0.12				4756.68 A
0	0	3265			0 A
	0				0 A
0.02	0.02	6788	0.02	0.02	1629.12 A
	0.02				1629.12 A
0.95	0.95	3841	0.95	0.95	43787.4 A
0.03	0.03	4088	0.03	0.03	1471.68 A
0.09	0.09	4235	0.09	0.09	4573.8 A
0.1	0.1	4668	0.1	0.1	5601.6 A
	1.17				55434.48 A

Notes

Left ARB in Jan 2009 -  
Took on Lisa's CC duti

07/08 is VPS?

Assigned all EOs/DCs

do we want to show thi

Moved to PTSD Jan 20

0.02	0.02	5897	0.02	0.02	1415.28 A
0.3	0.3	6127	0.3	0.3	22057.2 A
0.2	0.2	6127	0.2	0.2	14704.8 A
0.08	0.08	5896	0.08	0.08	5660.16 A
	0.6				43837.44 A
0.25	0.25	7474	0.25	0.25	22422 A
0.2	0.2	7516	0.2	0.2	18038.4 A
	0.45				40460.4 A
0.02	0.02	6602	0.02	0.02	1584.48 A
	0.02				1584.48 A
1	1	3599	1	1	43188 B
	1				43188
0.75	0.75	6830	0.75	0.75	61470 I
0.95	0.95	6770.57	0.95	0.9	77184.5 I
0	0	7899		0.75	0 I
0.5	0.5	7363	0.5	0.1	44178 I
0	0	7899		0.5	0 I
0	0	7068.5		0.95	0 I
0	0	5924.25		0	0 I
1	1	7563	1	1	90756 I
1	1	6830	1	1	81960 I
0	0				0 I
1	1	8294	1	1	99528 I
0	0	7109.1		0	0 I
0.1	0.1	7899	0.1	0.1	9478.8 I
0	0	4204		0	0 I
0.3	0.3	7899	0.3	0.3	28436.4 I
0.1	0.1	6830	0.1	0.1	8196 I
0.1	0.1	7899	0.1	0.1	9478.8 I
0.05	0.05	6829	0.05	0.05	4097.4 I
0.1	0.1	6504	0.1	0.1	7804.8 I
	5.95				522568.7 I
1	1	7242	1	1	86904 I
1	1	6911.63	1	1	82939.56 I
1	1	6835.71	1	1	82028.52 I
0.05	0.05	5529.3	0.05	0.05	3317.58 I
0.45	0.45	8379	0.45	0.45	45246.6 I
0.05	0.05	7899	0.05	0.05	4739.4 I
0	0	7899		0	0 I
0.2	0.2	7172	0.2	0.2	17212.8 I
0.1	0.1	7530	0.1	0.1	9036 I
0.8	0.8	7351	0.8	0.8	70569.6 I
0.2	0.2	7171	0.2	0.2	17210.4 I
	4.85				419204.5 I
0	0			0	0 I
0.95	0.95	8965	0.95	0.95	102201 I
1	1	8965	1	1	107580 I
0.05	0.05	8965	0.05	0.05	5379 I
0.05	0.05	8965	0.05	0.05	5379 I
0.1	0.1	8813	0.1	0.1	10575.6 I
	2.15				231114.6 I
0.75	0.75	9842	0.75	0.75	88578 I

Will need PTSD review  
appropriate staff split

Per HR: ARS1 \$8965 I

arbitrary/could be half I

0.1	0.1	9842	0.1	0.1	11810.4 I	
	0.85				100388.4 I	
0.4	0.4	10856	0.4	0.4	52108.8 I	Assigned all EOs/DCs
	0.4				52108.8 I	
0.95	0.95	8798	0.95	0.95	100297.2 I	
1	1	9082	1	1	108984 I	
0.2	0.2	8867	0.2	0.2	21280.8 I	
	2.15				230562 I	
1	1	7368	1		88416 P	
1	1	4867	1		58404 R	
1	1	7060	1		84720 R	
1	1		1		0 R	replaced by Knox
1	1	7560	1		90720 P	
1	1	6895	1	1	82740 P	
1	1	7899	1	1	94788 P	
1	1	7528	1	1	90336 P	
1	1	7899	1	1	94788 P	
1	1	7899	1	1	94788 P	
1	1	5034	1	1	60408 P	
1	1	7899	1	1	94788 P	
1	1	7899	1	1	94788 P	
0.3	0.3	7171	0.3	0.3	25815.6 P	
0.6	0.6	7530	0.6	0.6	54216 P	
	13.9				1109716 P	
1	1	7083	1		84996 P	
0.05	0.05	8379	0.05	0.05	5027.4 P	
0.05	0.05	6830	0.05	0.05	4098 P	
0.05	0.05	7899	0.05	0.05	4739.4 P	
	1.15				98860.8 P	
1	1	8352	1	1	100224 P	
1	1	8965	1	1	107580 P	
0.2	0.2	8965	0.2	0.2	21516 P	
0.05	0.05	8965	0.05	0.05	5379 P	
	2.25				234699 P	
1	1	9842	1	1	118104 P	
1	1	8502	1	1	102024 P	decided to make KMK
	2				220128 P	
1	1		1	0	0 P	Retired ???
	1				0 P	
1	1	10456	1	1	125472 P	Chuck retired 2/09 - ac
	1				125472 P	
1	1	3288	1		39456 P	
1	1	3538.71	1	0	42464.52 P	for Renae's time in OC
	2				81920.52 P	
1	1	2686	1		32232 P	replaced Maher
	1				32232 P	
1	1	9082	1	1	108984 P	
	1				108984 P	
1	1	7899	1		94788 R	
1	1	6504	1		78048 R	
1	1	5034	1		60408 R	
1	1	4204	1		50448 R	

1	1	7899	1	1	94788 R
1	1	6729	1	1	80748 R
1	1	2102	1	1	25224 R
1	1	5286	1	1	63432 R
1	1	7899	1	1	94788 R
1	1	6504	1	1	78048 R
1	1	6531	1	1	78372 R
1	1	7171	1	1	86052 R
0.15	0.15	5550	0.15	0.15	9990 R
0.05	0.05	7999	0.05	0.05	4799.4 R
0.05	0.05	7899	0.05	0.05	4739.4 R
0	0	7899	0	0	0 R
0.01	0.01	7899	0.01	0.01	947.88 R
0.04	0.04	7899	0.04	0.04	3791.52 R
0.2	0.2	7899	0.2	0.2	18957.6 R
1	1	7899	1	1	94788 R
1	1	6504	1	0.75	78048 R
1	1	6896	1	1	82740 R
1	1	7899	1	1	94788 R
1	0.75	3427	1	1	30843 R
0	0	7214			0 R
0.3	0.3	7789	0.3	0.25	28040.4 R
0.3	0.3	7763	0.3	0.3	27946.8 R
0.3	0.3	5286	0.3	0.3	19029.6 R
0.8	0.8	7899	0.8	0.8	75830.4 R
1	1	6504	1	1	78048 R
0.1	0.1	7421	0.1	0.1	8905.2 R
1	1	7114	1	1	85368 R
0.04	0.04	7999	0.04	0.04	3839.52 R
0.04	0.04	7583	0.04	0.04	3639.84 R
0.04	0.04	5550	0.04	0.04	2664 R
0.03	0.03	6829	0.03	0.03	2458.44 R
0.25	0.25	7899	0.25	0.25	23697 R
0.25	0.25	7899	0.25	0.25	23697 R
1	1	7529	1	1	90348 R
0.95	0.95	7530	0.95	0.95	85842 R
0.6	0.6	7899	0.6	0.6	56872.8 R
1	1	7899	1	1	94788 R
0.1	0.1	7171	0.1	0.1	8605.2 R
0.2	0.2	7421	0.2	0.2	17810.4 R
0.1	0.1	7899	0.1	0.1	9478.8 R
0.6	0.6	7899	0.6	0.4	56872.8 R
0.6	0.6	7530	0.6	0.6	54216 R
0.25	0.25	7899	0.25	0.25	23697 R
0.9	0.9	7172	0.9	0.9	77457.6 R
1	1	4204	1	1	50448 R
0.3	0.3	5286	0.3	0.3	19029.6 R
1	1	7899	1	1	94788 R
1	1	7899	1	1	94788 R
0.2	0.2	7523.8	0.2	0.7	18057.12 R
0.5	0.5	5034.91	0.5	0.5	30209.46 R
0.4	0.4	5034	0.4	0.4	24163.2 R

staff to Red/Admin (or  
Moved to OCC 3/09

Appointed 6/28/08 \$46  
Resigned 6/30/08

0.05	0.05	7528	0.05	0.05	4516.8 R
0.9	0.9	7092	0.9	0.9	76593.6 R
0.9	0.9	7899	0.9	0.9	85309.2 R
0.2	0.2	7899	0.2	0.2	18957.6 R
0	0				0 R
0.2	0.2	5034	0.2	0.2	12081.6 R
0.5	0.5	5286	0.5	0.5	31716 R
0.5	0.5	5286	0.5	0.5	31716 R
0.01	0.01	7899	0.01	0.01	947.88 R
0.01	0.01	6504	0.01	0.01	780.48 R
0.1	0.1	7109.1	0.1	0.1	8530.92 R
0.8	0.8	7899	0.8	0.8	75830.4 R
0.8	0.8	5034	0.8	0.8	48326.4 R
0.05	0.05	7899	0.05	0.05	4739.4 R
0.95	0.95	7899	0.95	0.95	90048.6 R
1	1	6829	1	1	81948 R
0.05	0.05	5034	0.05	0.05	3020.4 R
1	1	6895	1	1	82740 R
1	1	7734	1	1	92808 R
1	1	7465	1	1	89580 R
1	1	6504	1	1	78048 R
0.5	0.5	1785.8	0.5	0.5	10714.8 R
0.6	0.6	5924.25	0.6	0.6	42654.6 R
0.75	0.75	7899	0.75	0.75	71091 R
0.8	0.8	7899	0.8	0.8	75830.4 R
1	1	6895	1	1	82740 R
0.75	0.75	7172	0.75	0.5	64548 R
1	1	5737.6	1	1	68851.2 R
0.6	0.6	7899	0.6	0.6	56872.8 R
0.6	0.6	5110	0.6	0.6	36792 R
	50.02				4028547 R
1	1	5540	1	1	66480 R
1	1	7523.8	1	1	90285.6 R
0.2	0.2	8379	0.2	0.2	20109.6 R
0.15	0.15	6504	0.15	0.15	11707.2 R
0	0	6830			0 R
0.3	0.3	8379	0.3	0.1	30164.4 R
0.7	0.7	7523.8	0.7	0.7	63199.92 R
1	1	7899	1	1	94788 R
0.9	0.9	7899	0.9	0.9	85309.2 R
1	1	5540	1	1	66480 R
1	1	5540	1	1	66480 R
1	1	8379	1	1	100548 R
0.2	0.2	8379	0.2	0.7	20109.6 R
0.5	0.5	7899	0.5	0.5	47394 R
0.5	0.5	2512.38	0.5	0.5	15074.28 R
0.5	0.5	6829	0.5	0.5	40974 R
0.4	0.4	5276	0.4	0.4	25324.8 R
0.6	0.6	6897	0.6	0.6	49658.4 R
0.1	0.1	7899	0.1	0.1	9478.8 R
0.01	0.01	8379	0.01	0.01	1005.48 R
0.8	0.8	6829	0.8	0.8	65558.4 R

Per HR; \$7125 Resign

worked on reptg reg be

0.01	0.01	7899	0.01	0.01	947.88 R
0.01	0.01	7899	0.01	0.01	947.88 R
0.01	0.01	7899	0.01	0.01	947.88 R
0.1	0.1	8379	0.1	0.1	10054.8 R
0.15	0.15	6504	0.15	0.15	11707.2 R
0.05	0.05	5540	0.05	0.05	3324 R
0.05	0.05	5540	0.05	0.05	3324 R
0.05	0.05	7171	0.05	0.05	4302.6 R
0.05	0.05	8379	0.05	0.05	5027.4 R
0.9	0.9	8379	0.9	0.9	90493.2 R
1	1	7899	1	1	94788 R
1	1	7899	1	1	94788 R
0.05	0.05	7899	0.05	0.05	4739.4 R
1	1	7899	1	1	94788 R
1	1	5394.43	1	0.75	76733.16 R
0.5	0.5	1974.75	0.5	0.5	11848.5 R
0.5	0.5	8379	0.5	0.5	50274 R
1	1	7899	1	1	94788 R
0.1	0.1	8379	0.1	0.1	10054.8 R
1	1	8379	1	1	100548 R
0.6	0.6	7523.8	0.6	0.6	54171.36 R
	20.99				1788728 R
0.17	0.17	4986	0.17	0.17	10171.44 R
0.17	0.17	5086	0.17	0.17	10375.44 R
0.17	0.17	5086	0.17	0.17	10375.44 R
0.17	0.17	4623	0.17	0.17	9430.92 R
0.17	0.17	4869	0.17	0.17	9932.76 R
0.17	0.17	4869	0.17	0.17	9932.76 R
0.17	0.17	4770	0.17	0.17	9730.8 R
0.17	0.17	5086	0.17	0.17	10375.44 R
	1.36				80325 R
0.15	0.15	5335	0.15	0.15	9603 R
	0.15				9603 R
1	1	8294	1	1	99528 R
1	1	8661	1	1	103932 R
1	1	8965	1	1	107580 R
0.05	0.05	8965	0.05	0.05	5379 R
0.1	0.1	8965	0.1	0.1	10758 R
0.02	0.02	8965	0.02	0.02	2151.6 R
0.01	0.01	8965	0.01	0.01	1075.8 R
0.2	0.2	8661	0.2	0.2	20786.4 R
1	1	7954	1	1	95448 R
0.75	0.75	8965	0.75	0.75	80685 R
0.05	0.05	8550.82	0.05	0.05	5130.492 R
0.03	0.03	8965	0.03	0.03	3227.4 R
0.7	0.7	7954	0.7	0.7	66813.6 R
0.1	0.1	8965	0.1	0.1	10758 R
0.4	0.4	8965	0.4	0.3	43032 R
0.8	0.8	8965	0.8	0.8	86064 R
1	1	8154	1	1	97848 R
0.2	0.2	8965	0.2	0.5	21516 R
0.3	0.3	8965	0.3	0.3	32274 R

moved fro P to R

Are the ED PY's under

0.9	0.9	7954	0.9	0.9	85903.2 R
0.2	0.2	8965	0.2	0.2	21516 R
0.8	0.8	8965	0.8	0.8	86064 R
0.6	0.6	8965	0.6	0.6	64548 R
0.6	0.6	8219	0.6	0.6	59176.8 R
0.3	0.3	8965	0.3	0.3	32274 R
1	1	8965	1	1	107580 R
0.6	0.6	8965	0.6	0.6	64548 R
0.1	0.1	8965	0.1	0.1	10758 R
0.75	0.75	8137.53	0.75	0.75	73237.77 R
0.95	0.95	8550.82	0.95	0.95	97479.35 R
0.6	0.6	8154	0.6	0.6	58708.8 R
	16.11				1655781 R
0.18	0.18	9842	0.18	0.18	21258.72 R
1	1	9842	1	1	118104 R
0.1	0.1	9842	0.1	0.1	11810.4 R
0.6	0.6	9842	0.6	0.6	70862.4 R
0.8	0.8	9842	0.8	0.8	94483.2 R
0.05	0.05	9842	0.05	0.1	5905.2 R
0.2	0.2	9842	0.2	0.2	23620.8 R
0.8	0.8	9842	0.8	0.8	94483.2 R
0.5	0.5	9842	0.5	0.5	5905.2 R
0.45	0.45	9842	0.45	0.45	53146.8 R
	4.68				552726.7 R
0.05	0.05	4743	0.05	0.05	2845.8 R
	0.05				2845.8 R
0.03	0.03	5673	0.03	0.03	2042.28 R
	0.03				2042.28 R
1	1	10339	1	0	124068 R
0.15	0.15	6400.33	0.15	0	11520.59 R
0.5	0.5	10339	0.5	0.5	62034 R
	1.65				197622.6 R
0.1	0.1	10856	0.1	0	13027.2 R
0.5	0.5	10856	0.5	0	65136 R
0.7	0.7	10856	0.7	0	91190.4 R
0.2	0.2	10856	0.2	0.2	26054.4 R
	1.5				195408 R
0.05	0.05	3996	0.05	0.05	2397.6 R
	0.05				2397.6 R
0.02	0.02	2695.2	0.02	0.02	646.848 R
	0.02				646.848 R
0.05	0.05	2209.2	0.05	0.7	1325.52 R
	0.05				1325.52 R
0.05	0.05	3264	0.05	0.7	1958.4 R
	0.05				1958.4 R
1	1	9082	1	1	108984 R
0.04	0.04	9082	0.04	0.04	4359.36 R
0.1	0.1	9082	0.1	0.1	10898.4 R
0.03	0.03	9082	0.03	0.03	3269.52 R
0.15	0.15	9082	0.15	0.15	16347.6 R
0.15	0.15	9082	0.15	0.15	16347.6 R
0.5	0.5	9082	0.5	0.5	54492 R

shouldn't qualify (Pavle

will need RD review of

should this be 08/09 Bi  
for SB 375

this is arbitrary/half Sci  
Assigned all EOs/DCs  
shouldn't qualify (Pavle

Assigned all EOs/DCs  
Assigned all EOs/DCs  
Assigned all EOs/DCs  
Assigned all EOs/DCs

0.4	0.4	9082	0.4	0.1	43593.6 R	
1	1	9082	1	1	108984 R	
0.05	0.05	9082	0.05	0.05	5449.2 R	
0.2	0.2	8867	0.2	0.2	21280.8 R	
0.1	0.1	9082	0.1	0.1	10898.4 R	
0.05	0.05	9082	0.05	0.05	5449.2 R	
0.05	0.05	9082	0.05	0.8	5449.2 R	
0.9	0.9	7530	0.9	0.9	81324 R	
0.05	0.05	8798	0.05	0.05	5278.8 R	
0.6	0.6	9082	0.6	0.6	65390.4 R	shouldn't qualify (Pavle
1	1	4541	1	1	54492 R	
1	1	9082	1	1	108984 R	
0.75	0.75	9082	0.75	0.35	81738 R	
0.6	0.6	9082	0.6	0.6	65390.4 R	
	8.72				878400.5 R	
0.01	0.01	2194.8	0.01	0.01	263.376 R	
	0.01				263.376 R	
0.05	0.05	6399	0.05	0.05	3839.4 R	
	0.05				3839.4 R	
0.9	0.9	7605	0.9	0.9	82134 S	
0.7	0.7	7172	0.7	0.7	60244.8 S	
0.6	0.6	4414	0.6	0.6	31780.8 S	
1	1	6504	1	1	78048 S	
0.2	0.2	7899	0.2	0.2	18957.6 S	
1	1	7899	1	1	94788 S	
0.5	0.5	7899	0.5	0.5	47394 S	
0.42	0.42	6504	0.42	0.42	32780.16 S	
0.5	0.5	3406.86	0.5	0.5	20441.16 S	
0.42	0.42	6504	0.42	0.42	32780.16 S	
0.5	0.5	5884.57	0.5	0.5	35307.42 S	
0.5	0.5	7899	0.5	0.5	47394 S	
0.025	0.025	7899	0.025	0.025	2369.7 S	
0	0	1601.52		0.15	0 S	Exhaust Testing
0	0	6117			0 S	Exhaust Testing
0	0	7899		0.9	0 S	Evaporative Testing
0	0			0.25	0 S	Evaporative Testing
0.15	0.15	7899	0.15	0.05	14218.2 S	Enviro Impact Label fo
	7.415				598638 S	
0.7	0.7	7899	0.7	0.7	66351.6 S	
0.8	0.8	8379	0.8	0.8	80438.4 S	
0.85	0.85	7899	0.85	0.85	80569.8 S	
0.1	0.1	7899	0.1	0.1	9478.8 S	assume all MLD are S
0.42	0.42	7899	0.42	0.42	39810.96 S	
0	0	8379			0 S	Exhaust Testing
0	0	2009.9		0.25	0 S	Exhaust Testing
0	0	5276		0.15	0 S	Exhaust Testing
0	0	7899			0 S	Exhaust Testing
0.1	0.1	5817	0.1	0.01	6980.4 S	Enviro Impact Label fo
0.1	0.1	7899	0.1	0.05	9478.8 S	Enviro Impact Label fo
0.1	0.1	6829	0.1	0.01	8194.8 S	Enviro Impact Label fo
0.1	0.1	7899	0.1	0.01	9478.8 S	Enviro Impact Label fo
0.1	0.1	6504	0.1	0.01	7804.8 S	Enviro Impact Label fo

0.1	0.1	6829	0.1	0.01	8194.8 S	Enviro Impact Label fo
0.1	0.1	7899	0.1	0.01	9478.8 S	Enviro Impact Label fo
0.1	0.1	4838	0.1	0.01	5805.6 S	Enviro Impact Label fo
	3.67				342066.4 S	
0.6	0.6	8965	0.6	0.6	64548 S	
0.8	0.8	7756	0.8	0.8	74457.6 S	
0.85	0.85	8154	0.85	0.85	83170.8 S	
0.6	0.6	8965	0.6	0.6	64548 S	
0.1	0.1	8965	0.1	0.1	10758 S	
0.05	0.05	8965	0.05	0.05	5379 S	
0	0	4757.24		0.05	0 S	Exhaust Testing
0.1	0.1	8965	0.1	0.01	10758 S	Enviro Impact Label fo
	3.1				313619.4 S	
0.75	0.75	9842	0.75	0.75	88578 S	
0	0	9842		0.05	0 S	Exhaust Testing
0.01	0.01	9842	0.01	0.01	1181.04 S	Enviro Impact Label fo
	0.76				89759.04 S	
0.3	0.3	5348	0.3	0.3	19252.8 S	
0.25	0.25	4278.4	0.25	0.25	12835.2 S	
	0.55				32088 S	
0	0	3587		0	0 S	Exhaust Testing
0	0	3841			0 S	Exhaust Testing
	0				0 S	
0.15	0.15	4544	0.15	0.15	8179.2 S	Exhaust and Evaporati
0	0	4153		0.15	0 S	Exhaust Testing
0	0	4328.16		0.33	0 S	Evaporative Testing
0	0	4544		0.33	0 S	Evaporative Testing
	0.15				8179.2 S	
0.005	0.005	10856	0.005	0	651.36 S	Assigned all EOs/DCs
	0.005				651.36 S	
0.2	0.2	4986	0.2	0.2	11966.4 S	
	0.2				11966.4 S	
0.3	0.3	2820	0.3	0.3	10152 S	
0.05	0.05	3264	0.05	0.05	1958.4 S	
	0.35				12110.4 S	
0	0	4219		0.5	0 S	
	0				0 S	
0.5	0.5	8867	0.5	0.5	53202 S	
0.6	0.6	9082	0.6	0.6	65390.4 S	
0.15	0.15	9082	0.15	0.15	16347.6 S	
0.2	0.2	9082	0.2	0.15	21796.8 S	
0.8	0.8	4541	0.8	0.8	43593.6 S	
0.05	0.05	9082	0.05	0.05	5449.2 S	
0.5	0.5	9082	0.5	0.5	54492 S	
0.6	0.6	9082	0.6	0.6	65390.4 S	
0.25	0.25	9082	0.25	0.25	27246 S	
0.15	0.15	9082	0.15	0.05	16347.6 S	Enviro Impact Label fo
	3.8				369255.6 S	
0.25	0.25	2368.8	0.25	0.25	7106.4 S	
0.3	0.3	4088	0.3	0.3	14716.8 S	
0.3	0.3	3597	0.3	0.3	12949.2 S	
	0.85				34772.4 S	

0.2	0.2	5757	0.2	0.2	13816.8 S
	0.2				13816.8 S
0	0	6504	?		0
0	0	7171		0.5	0
0	0	7899		0.4	0
0	0	7899		0.35	0
0	0	3803.62		0.8	0
0	0	7899		0.2	0
0	0	7899		1	0
0	0	7899		0	0
0.25	0.25	5034	0.25	1	15102
0	0	5034		1	0
0	0	5034		0.9	0
0	0	5034		1	0
0	0	6829		1	0
0.25	0.25	6829	0.25	0.01	20487
	0.5				35589
0	0	7899		0.35	0
0	0	6829		0.25	0
0	0	5540		0.25	0
0	0	3716.57		0.1	0
0	0	8379		0.5	0
0	0	5276		0.15	0
0	0	7899		0.1	0
0.5	0.5	6770.57	0.5	1	40623.42
0	0	6504	?		0
	0.5				40623.42
0	0	8562		0.4	0
0	0	8965		0.65	0
0	0	8965		0.5	0
	0				0
0	0	9842		0.25	0
0	0	9842		0.65	0
	0				0
0.05	0.05	5348	0.05		3208.8
	0.05				3208.8
0.05	0.05	4620	0.05		2772
	0.05				2772
0.1	0.1	3969	0.1	0.01	4762.8
0.65	0.65	4033	0.65	0.01	31457.4
0.25	0.25	3841	0.25	0.01	11523
0.08	0.08	3841	0.08	0.01	3687.36
0.18	0.18	5346	0.18	0.01	11547.36
0.15	0.15	5346	0.15	0.01	9622.8
0.2	0.2	5897	0.2	0.01	14152.8
0.65	0.65	4619	0.65	0.01	36028.2
0.25	0.25	5897	0.25	0.01	17691
0.25	0.25	4850	0.25	0.01	14550
0.2	0.2	4619	0.2	0.01	11085.6
0.35	0.35	4850	0.35	0.01	20370
	3.31				186478.3
0.25	0.25	5897	0.25	0.01	17691

Per HR: APS \$5034 w/  
per HR: APS \$ 5034 w

started at ARB in Dece

Appointed 2/27/09



.treach/

174. Eff. 1/30/09 \$5034. Eff. 3/1/09 ¼ time base \$3427.02.

ay)

specific

CP? (F code)

ience?  
to Admin  
ay)

to Admin  
to Admin  
to Admin  
to Admin

/furlough \$4569.36 appointed 03/23/09  
/furlough \$4569.36 appointed 02/09/09

ember '08