



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

*Office of the Executive Officer
Barry R. Wallerstein, D.Env.
909.396.2100, fax 909.396.3340*

August 11, 2011

Mary Nichols, Chairman
James Goldstene, Executive Officer
Attn: Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento CA 95812

Electronic submittal: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: SCAQMD Comments on the Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

The staff of the South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to provide comments on the Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. The SCAQMD is the regional air quality agency responsible for Orange and the populated portions of Los Angeles, San Bernardino, and Riverside Counties. We have the regulatory responsibility for more than 100,000 businesses, of which about 30,000 have district permits. While our primary responsibility is reducing criteria and toxic emissions from stationary sources, our agency is also responsible for the consolidated air quality management plans for the region. We have over 750 employees, including over 140 engineers and 120 inspectors that issue permits, conduct inspections, audit emission reports, handle complaints, and identify violations. The SCAQMD staff supports the Governor's targets to reduce greenhouse gases. This will prevent serious detrimental impacts and will also help reduce local ozone levels.

Currently the SCAQMD has fourteen members of our staff now recognized as accredited by CARB for GHG verification, of these, four are recognized as lead verifiers. We appreciate the changes made to the GHG Mandatory Reporting Regulation within section 95133(h) which resolved the conflict of interest issues for our district that prevented us from becoming a verification body that can provide services to facilities for which we also issue permits. However, we understand that other air districts may still be encountering problems in this regard and we encourage broad-scale resolution of any remaining issue.

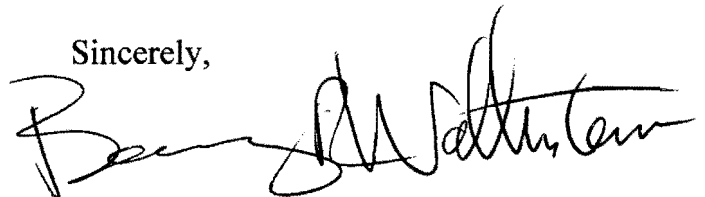
Cleaning the air that we breathe...

As directed in CARB Resolution 10-43, the amendments to the CARB GHG Mandatory Reporting Regulation have subsequently made this regulation very similar to the EPA GHG Mandatory Reporting Regulation with the major differences being reporting thresholds and how verification is conducted. The similarity between state and federal regulations reiterates the needs identified in our previous comments of streamlining the different agency reporting requirements of air pollutants through consolidated reporting. This consolidation and streamlining should not only occur between the authorities with GHG reporting requirements, but as our previous efforts show, also occur with criteria pollutant reporting. We have been advocating this consolidated reporting approach since our January 31, 2006 comment letter on the Climate Action Team's Report to the Governor and Legislature when this GHG regulation was still a concept. We previously modified our criteria pollutant reporting system to include the little additional data needed to report GHGs. This system was developed to then have the GHG data submitted to us be simultaneously uploaded to the CARB GHG reporting software.

We provided similar comments to EPA in June, 2009 as they underwent rulemaking for their GHG Reporting Regulation. The EPA is currently coordinating with other states to allow for a single GHG reporting program that will satisfy both the State and Federal requirements. Further consolidated reporting will benefit our agencies and businesses by avoiding duplicative reporting, reduce inconsistencies, and improve reporting efficiencies. We continue to recommend this concept be further considered as CAPCOA and SCAQMD have previously expressed in comment letters to CARB on December 8 and 14, 2010 respectively.

If you would like to discuss this further, have any questions on these comments, or need additional information please contact, at (909) 396-2100.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry R. Wallerstein". The signature is fluid and cursive, written over a white background.

Barry R. Wallerstein, D.Env.
Executive Officer

BRW:EC:JW:PF:AK