State Building and Construction Trades Council

ROBERT L. BALGENORTH
PRESIDENT

of California

JAMES W. KELLOGG SECRETARY-TREASURER

April 20, 2009

Chartered by
BUILDING AND CONSTRUCTION TRADES
DEPARTMENT
AFL - CIO

Mary D. Nichols, Chairwoman California Air Resources Board Headquarters Building 1001 "I" Street Sacramento, CA 95812



Chairwoman Nichols:

The Building Trades applauds the efforts of the California Air Resources Board (ARB) to identify ways to curb greenhouse gas (GHG) emissions and to attempt to set the stage for the rest of the country to follow suit. And we can do it in a way that creates new green jobs. The great men and women of the California Trades are proud to have built California's newest low carbon ethanol plants. These plants are the cleanest in the nation and produce the cleanest fuel in the nation. This is just the beginning of a green job growth industry that will lead the state to be leaders in CO2 reduction manufacturing and jobs.

We have one simple request which is fundamental to any competitive fair performance based regulation. Measure all fuels the same.

We support moving forward on April 23 with a regulation that treats all fuels the same. This would mean a regulation using the well known scientifically established direct effect emission factors of the GREET model.

In the meantime we acknowledge that you actually have the time to finish the extensive work necessary for incorporating all indirect effects for all fuels before the actual effective date of the regulation which is 2011.

Sincerely,

Robert Balgenorth

President

RLB:tg opeiu#29/afl-cio

ORIGINAL: Copies:

Board Clerk
Executive Officer

Chair