



September 2, 2009

Via: email to ccworkshops@arb.ca.gov, jblakesl@arb.ca.gov, and jcostant@arb.ca.gov

Jeannie Blakeslee and Jon Costantino
California Air Resources Board
Sacramento, CA

Re: Cost of Administration Fee Regulation

Dear Ms. Blakeslee and Mr. Costantino:

We would like to reiterate our support for expeditious implementation of the Cost of Administration Fee Regulation to ensure that AB 32 implementation becomes self-sufficient at the earliest possible date. We understand that CARB feels it might be difficult to collect the fee by spring 2010 as originally planned. Before making that decision, we urge you to give stakeholders additional information regarding the impacts of the proposed delay:

- How much additional money will CARB need to collect to cover finance charges as a result of a delay from spring 2010 (FY 2009-10) to fall 2010 (FY 2010-11)?
- Give a few potential timelines for getting the fee implemented, similar to slide 22 presented at the August 25 workshop, but with more detail about reasons for the time gaps. For example, you could give three scenarios:
 1. as expeditious as legally possible, regardless of practicalities;
 2. as expeditious as practicably possible, if all goes well; and
 3. a conservative timeline, allowing for unforeseen difficulties.

- What streamlining measures could be put in place to reduce administrative burdens without compromising public input in order to speed up implementation of the fee and ensure a spring 2010 implementation date?

This information will help us understand the process and your reasoning and inform our future comments on this vital regulation.

Sincerely,



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Climate Projects
Natural Resources Defense Council



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