

July 17, 2008

Rachel Tornek
Senior Policy Manager
California Climate Action Registry
523 West 6th. Street, Suite 428
Los Angeles, CA 90014

Re: Public Comment on Proposed Local Government Operation Protocol

Dear Ms. Tornek,

Thank you for your ongoing efforts to engage stakeholders and create a protocol for identifying, quantifying and reporting emissions attributable to local government operations. Local governments play a vital role in reducing greenhouse gas emissions both within and outside California through responsible planning and direct control of municipal operations. This protocol is the first step in that process: providing clear and consistent guidelines for creating accurate emissions measurements and reporting those emissions into a publicly accessible database.

Environmental Defense Fund supports protocols that are relevant, complete, consistent, transparent, and accurate, and our reading of current draft of the Local Government Operations Protocol suggests it meets each of these criteria. In particular, one of the best accomplishments is it provides clear guidelines on what activities fall within the control of local government and are relevant in quantifying and reporting emissions.

Once again, thank you for your hard work in preparing this thoughtful and accurate protocol and for considering public input throughout the process. We look forward to working with your staff as the protocol moves toward final adoption. Please feel free to contact me with questions or concerns.

Sincerely,



Timothy O'Connor
Attorney – California Climate Initiative
Environmental Defense Fund