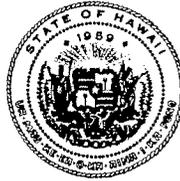


LINDA LINGLE  
GOVERNOR OF HAWAII



CHIYOME L. FUKINO, M.D.  
DIRECTOR OF HEALTH

STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P. O. BOX 3378  
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In reply, please refer to:  
File:

February 11, 2008

Mr. Marcus Peacock  
Deputy Administrator  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 1102A  
Washington, DC 20460

Dear Mr. Peacock:

Request for a single EPA data exchange standard for greenhouse gases

As a state environmental commissioner and ECOS member, I appreciate your leadership to reduce EPA burdens on state environmental programs. I also appreciate EPA's support for administrative Lean work, and my department will start its first pilot Lean project this year.

I seek your help to achieve significant efficiencies and benefits for the states and EPA as they use and share information on greenhouse gases. I ask that EPA develop a single data exchange standard for greenhouse gases and criteria air pollutants. We have a great opportunity, but the standard should be substantially done before July, 2008. Your leadership can be decisive.

The states and EPA can build an interoperable greenhouse gas emission data system, and possibly a single air pollutant data system. Furthermore, the system could even include Canada and Mexico. There is strong interest by key people for both the EPA-States Exchange Network (EN or network) and the multi-state, multi-nation, multi-tribe The Climate Registry (TCR or registry) in the potential interaction of these data systems. TCR and the EN perform different roles and can be complementary. Right now, the EN, TCR, and your Office of Air (OA) staff are discussing how the network and the registry might be interoperable and help data sharing, and both TCR and OA are using the same contractor, PQA, for software development, so there is a chance to accelerate work. I understand that there is EPA interest in and some progress toward the development of a single greenhouse gas data exchange standard, and I applaud that, but I have not heard yet that EPA has committed itself to a single standard or has any implementation schedule. We have a great chance to craft a good system for the continent; the work now could also lay a foundation to help EPA meet its new duty to adopt by June 2009, regulations for national greenhouse gas emission reporting.

Mr. Marcus Peacock

February 11, 2008

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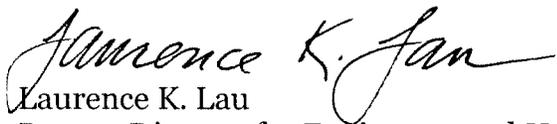
However, one major limiting factor for TCR is that EPA has or is working on two air data exchange standards, one for criteria pollutants under the National Emission Inventory (NEI) (later to become the Emissions Inventory System (EIS)), and another for greenhouse gases called AirDEX. The other major limit for the registry is that it is proceeding to make its reporting system operational by the end of June 2008. If the registry is to develop an approach compatible with these EPA efforts, it needs software design parameters as soon as possible.

It would help greatly if EPA commits soon to develop a single standard quickly.

As a member of the Exchange Network Leadership Council (ENLC) and Hawaii's Board member for The Climate Registry, I see the value of an interoperable system and of taking advantage of the significant investment already made in the EN. I am speaking at ECOS and TCR meetings to promote collaboration between the EN and TCR. I have been working to get the right people talking to each other. As an environmental commissioner from a small state, I have a special interest in economy and advocate for single, efficient data systems, instead of multiple systems. While I can only speak for my state and not for TCR, ECOS, or the entire ENLC, I think EPA and all states share the foregoing interests.

Any attention and help you can give will be greatly appreciated.

Best regards,



Laurence K. Lau

Deputy Director for Environmental Health

e-c. David Paylor, Virginia  
Steve Owens, Arizona  
Doug Scott, Illinois  
Gina McCarthy, Connecticut  
Toni Hardesty, Idaho  
Steve Brown, ECOS  
Diane Wittenberg, TCR  
Eileen Tutt, California, TCR  
Jill Gravender, TCR  
Molly O'Neill, OEI  
Linda Travers, OEI  
Chet Wayland, OAR, ENLC  
Mitch West, ENLC

References: [www.exchangenetwork.net](http://www.exchangenetwork.net), [www.theclimateregistry.org](http://www.theclimateregistry.org)