On May 9, Sierra Club requested that Governor Jerry Brown "re-evaluate" the cap-and-trade rule promulgated by the California Air Resources Board. The Sacramento Bee has some initial reactions and you can read the original letter here. As noted in our earlier posts, CARB's cap-and-trade rule has come under judicial scrutiny and its status is somewhat unclear.

Sierra Club raises two main objections. First, it questions the role of offsets in the rule. According to Sierra Club,

> Excessive reliance on offsets could open up loopholes that undermine the very purpose of California's AB 32 cap on emissions.

Sierra Club is particularly concerned that the forestry offsets are, well, imaginary, environmentally destructive, and unenforceable. I previously blogged that, just looking at the numbers, the cap-and-trade program could rely completely on offsets until 2017. One answer to the concern with forestry offsets is more thorough verification.

Second, Sierra Club objects to giving away valuable emission allowance to the oil extraction and refining industries.