

May 7, 2007

Linda Adams
Secretary for Environmental Protection
California Environmental Protection Agency
1001 I St
Sacramento, CA 95812

Re: Suggestions for Early Action Measures

Dear Secretary Adams:

We represent a broad cross-section of environmental, conservation, public health and other public interest organizations who are strong advocates for an aggressive early action measure strategy in the implementation of Assembly Bill (AB) 32. Moving forward quickly to achieve measurable reductions in global warming pollution is vital for mitigating potential climate impacts while the state works toward finalizing its longer term strategy.

We acknowledge and appreciate the Administration's commitment to successful implementation of AB 32, and believe the process for meeting the goals of the law is on track. We also are encouraged to see agencies beyond the Air Resources Board (ARB) acknowledge their responsibilities in meeting the state's greenhouse gas (GHG) reduction goals enacted in AB 32. The draft report released on April 20, 2007 clearly reflects the progress the CAT has made in developing specific proposals and quantifying the GHG reduction benefits associated with their implementation.

Given the challenge California faces in achieving our needed reductions in global warming pollution while meeting economic goals, we need all sectors of the economy – including those represented by the agencies participating in the Climate Action Team – to aggressively explore options to expand and solidify the proposed early action measures noted in your draft report.

Specifically, we ask that you consider the following proposals.

Water Measures

Establish a certification program and statewide water use database at the Department of Water Resources to ensure compliance with the Urban Water Best Management Practices (BMPs) contained in the Memorandum of Understanding Regarding Water Conservation in California, and establish incentives for urban water agencies to exceed the BMPs. The draft report of April 20 limits efforts on BMPs to promoting voluntary compliance, which we consider to be an inadequate approach.

Transportation Planning and Land Use Measures

Given the substantial emissions associated with transportation planning and land use practices in California, the measures identified in the April 20 report continue to be too

vague to provide any assurance that the needed reductions will be achieved. Since decisions on land use made today will have significant impact on greenhouse gas emissions both immediately and long-term, it is crucial to identify strategies that could achieve significant reductions and begin implementing them as soon as possible. We recommend that the Climate Action Team, in collaboration with ARB and local governments, develop a clear roadmap for achieving emissions reductions through smart growth and better transportation and land use planning, and identify lead agencies who will implement each specific strategy. Additionally, measures to facilitate protection and stewardship of forest and agricultural lands, both to prevent emissions and sequester CO₂, can and should get underway immediately.

Waste Measures

We conceptually support implementation of the actions outlined in the CAT report. The effectiveness of these measures will be contingent upon full and aggressive implementation by the CIWMB in conjunction with the ARB. We will participate in the Integrated Waste Management Board's early action measure process, including the upcoming workshop on the Board's GHG reduction strategy. Once these items have been more fully developed by the CIWMB we will provide a comprehensive response.

Infrastructure Bonds

California is undertaking a once-in-a-lifetime investment in excess of \$40 billion dollars to ensure that our infrastructure meets the needs of the state's growing population. This investment can be made in a way that helps to achieve the goals of AB 32 or in a way that frustrates our ability to achieve them. We recommend addition of an early action measure requiring that bond spending be allocated in a way that maximizes environmental benefits, including greenhouse gas reductions.

Provide Firm Deadlines and Commitments for Measures

While we are encouraged to see greater specificity in identifying measures that may be undertaken by state agencies, we need to see firm commitments, better estimates of anticipated reductions and more specific deadlines for these measures to be pursued in order to have confidence that the actions being considered will genuinely contribute to meeting the AB 32 cap.

We have made an effort to focus on our comments on our highest priorities as you move toward finalizing your list of proposed early action measures. Given the breadth of organizations involved in this effort, each organization listed below may not necessarily endorse or have expertise related to every recommendation contained in this letter. However, all of the organizations are united in support of full and strong implementation of AB 32 and will continue to provide constructive input to the Climate Action Team to help ensure enactment of a comprehensive program that meets all of the goals of the statute. We thank you for your consideration.

Sincerely,

Bonnie Holmes-Gen, American Lung Association of California
Danielle Fugere, Bluewater Network/Friends of the Earth
Susan Smartt, California League of Conservation Voters
Scott Smithline, Californians Against Waste
Tim Carmichael, Coalition for Clean Air
Joel Bush Communities for Clean Ports
Tam Hunt, Community Environmental Council
Jason Barbose, Environment California
Karen Douglas, Environmental Defense
Devra Wang, Natural Resources Defense Council
Michelle Passero, Pacific Forest Trust
Matt Vander Sluis, Planning and Conservation League
Bill Magavern, Sierra Club California
Dan Kalb, Union of Concerned Scientists

cc:

Climate Action Team Members
ARB Chair Robert Sawyer
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