

November 17, 2008

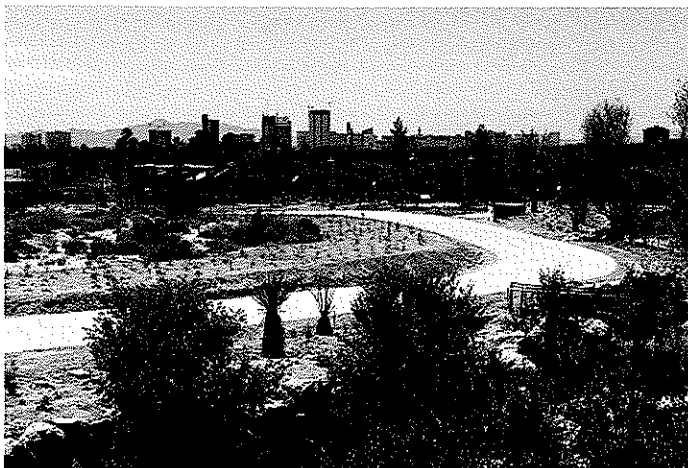
Mary D. Nichols  
Chairman  
California Air Resources Board  
1001 "T" Street  
PO Box 2815  
Sacramento, CA 95812

Re: CEQA and Greenhouse Gas Emission Proposed Scoping Plan  
ALERT - LIGHT COLORED COOL PAVEMENT MISSING IN ACTION

Dear Mary Nichols and ARB Members,

Light colored cool pavement was selected as an Early Action Item in previous ARB communications regarding implementation of AB 32 legislation. As of this date, the subject of Cool Pavement is conspicuously missing from any inclusion in the Proposed Scoping Plan. The continuing proliferation of heat absorbent black asphalt pavement surfacing is unaddressed, as is the significant role of black asphalt pavement in generating Urban Heat Island problems and increasing air pollution, smog formation, Greenhouse Gas Emission, Global Warming and Climate Change. This is a major omission in the Proposed Scoping Plan and unacceptable for a program advertising itself as addressing the worst contributors to Greenhouse Gas Emission and Climate Change problems.

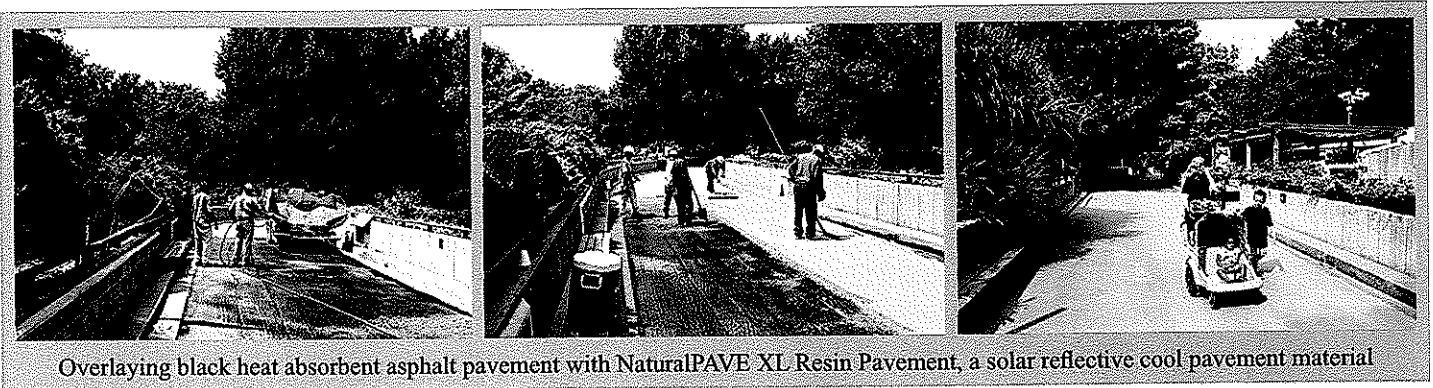
Cold applied light colored pavement surfacing materials are now in service and can be phased in as alternatives to black hot mix asphalt pavement for new construction and as overlays for covering existing black asphalt pavement installations. As a proponent of green building development and use, it is appropriate that the State of California is also home base for the leading company of green pavement technology. Pictured here are a sampling of cold applied solar reflective pavement material installations supplied by



**Environmentally Appropriate Product Technologies for Pavements, Dust Control, Erosion Control and Soil Stabilization**

PO BOX 2779, Merced, California, 95344-0779 USA  
Ph: (800) 523-9992 or (209) 383-3296 Fax: (209) 383-7849 Email: info@sspco.com Website: www.sspco.com

Soil Stabilization Products Company, Inc. (SSPCo) at locations across the country, including projects here in California for the National Park Service, the California Department of Transportation, the University of California, and projects for county, city and public schools. It is now time for the State of California to assign Early Action status for light colored pavement materials and to create the economies of scale that will be required to economically phase-in green pavement materials.



The time is now to mandate use of light colored pavement surfacing for new public facility construction projects and begin the transition away from the uncontrolled spread of heat absorbent black pavement surfaces. With global warming an acknowledged reality, the excessive heat generated by heat absorbent black pavement surfaces will also be more of a hazard to human health with every passing year. As the world leader in legislation to address Greenhouse Gas Emission problems, the State of California should lead by example in implementation of appropriate green product technology. The upcoming implementation of the Scoping Plan next month requires quick action be taken to reinstate Light Colored Pavement materials for Early Action status. Since there is a five year lapse until the Scoping Plan is again updated, it is essential that the current Scoping Plan recognizes the serious climate change problems associated with the further spread of black heat absorbent pavement surfaces and encourages implementation of cool pavement surfacing with Early Action status.

Sincerely,



Robert B Randolph  
President

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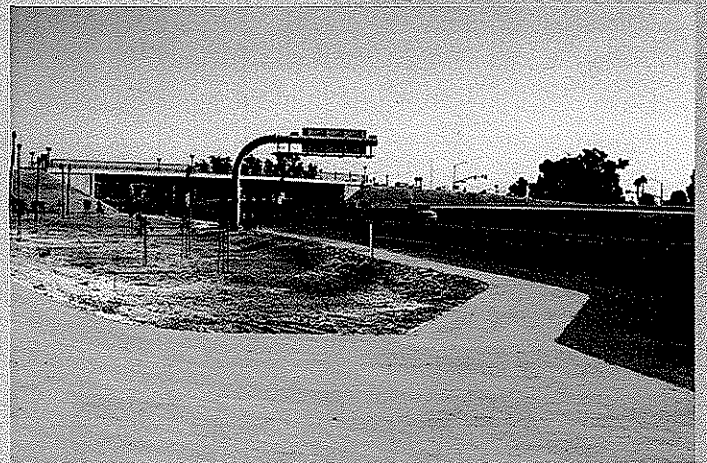
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# LIGHT COLORED COOL PAVEMENTS



University of California - Riverside Campus  
Access Roads



California Department of Transportation (Caltrans) - Oxnard, California  
Highway Accessory Pavements



National Park Service - Golden Gate National Recreation Area  
San Francisco, California - Coastal Access Trail

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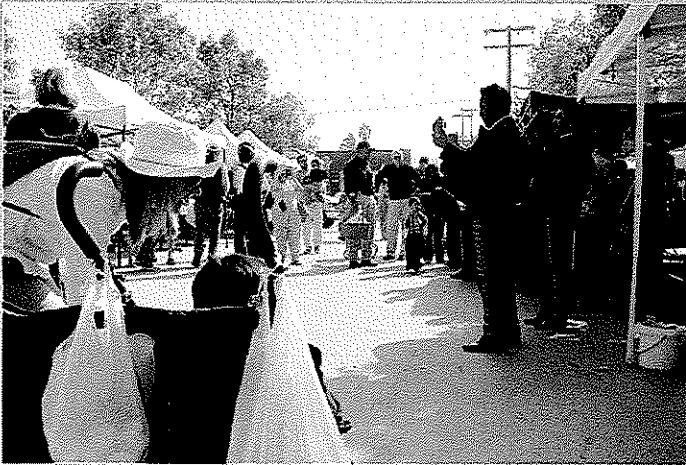
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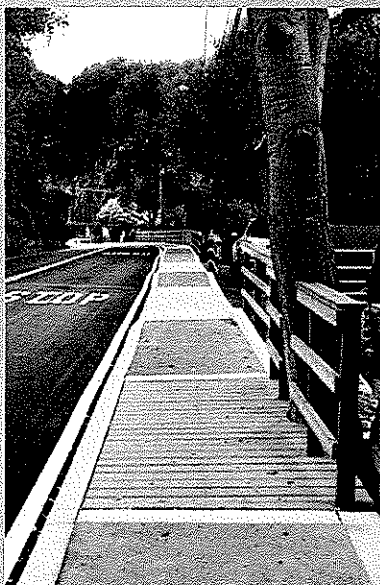
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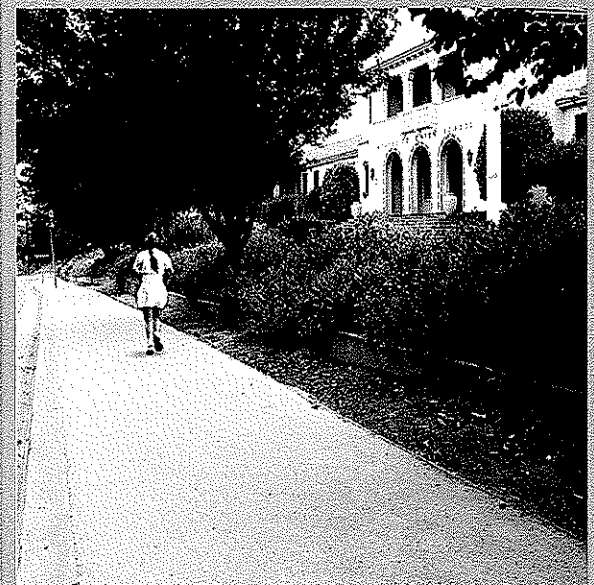
National Park Service - John Muir National Historic Site  
Martinez, California - Access Roads



City of Santa Monica - Virginia Avenue Park  
Farmers Market Area



Santa Cruz County  
Santa Cruz and Soquel Village - Accessible Walkways



Montecito Union School District  
Santa Barbara, California - Accessible Walkways

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