

UNION OF CONCERNED SCIENTISTS

AMERICAN LUNG ASSOCIATION OF CALIFORNIA

BREATHE CALIFORNIA

CALIFORNIA THORACIC SOCIETY

OUR CHILDREN'S EARTH

BREAST CANCER FUND

PHYSICIANS FOR SOCIAL RESPONSIBILITY – SF BAY AREA

June 13, 2008

Mary Nichols, Chairperson
California Air Resources Board
1001 'I' Street • P.O. Box 2815
Sacramento, CA 95812

RE: AB 32 Scoping Plan – FEEBATES as a Transportation Sector Strategy

Dear Chairperson Nichols:

We, the undersigned public health and science groups, urge you to include in the AB 32 scoping plan a strong request to the state legislature for authorization and direction to create a feebates program to reduce global warming emissions from passenger cars and light-duty trucks in California.

As you know, a feebates program would assign one-time surcharges and rebates on new passenger cars and trucks on a sliding scale based upon their emissions of global warming pollution. The rebates and surcharges act as market-oriented incentives for consumers to purchase, and for manufacturers to produce, cleaner, lower-emitting vehicles. Such a program will not only help reduce global warming pollution, but could also reduce vehicle emissions that contribute to smog-formation, thus contributing to the near-term protection of public health in California.

Continued global warming is expected to exacerbate air quality problems by increasing the frequency, duration, and intensity of conditions conducive to air pollution formation. Currently, California already experiences the worst air quality in the nation, with more than 95% of Californians living in areas with unhealthy air. Hotter days will also lead to an increased demand for power and more smog-forming emissions, leading to more hospital admissions and emergency room visits for asthma, in addition to more school absences.

With global warming unchecked, the risk of wildfires is expected to increase by as much as 50 percent, which would further worsen air quality by elevating soot levels. As temperatures rise, California's population will face greater risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress. By mid-century, extreme heat events in urban centers such as Los Angeles and San Bernardino are projected to cause two to three times as many heat-related deaths as there are today.

A vehicle feebates program can work well independently or in conjunction with existing vehicle emission regulations. Research by the University of Michigan's Transportation Research Institute indicates that, in conjunction with California's current vehicle global warming standards, a fully implemented feebates program can reduce global warming pollution from the tailpipe of new vehicles by an additional 21 percent of what would be achieved by the 'Pavley' regulations alone.

California residents want more affordable cars and trucks that meet their needs and do not harm the environment. A successful feebates program would be designed to complement the state's efforts to improve air quality and ensure that no loss of emissions benefits occurs for any criteria pollutant as the result of any specific design consideration.

Thank you very much for considering our request. We look forward to working with you on this and other matters relating to AB 32 implementation.

Sincerely,

Spencer Quong
Union of Concerned Scientists

Bonnie Holmes-Gen
American Lung Association of California

Jeanne Rizzo, R.N.
Breast Cancer Fund

Andy Katz
Breathe California

Colleen Richardson, CAE
California Thoracic Society

Tiffany Schauer
Our Children's Earth

Evan Krasner, M.D.
Physicians for Social Responsibility – San Francisco Bay Area Chapter

CC: Linda Adams CalEPA Secretary
Dan Dunmoyer, Governor's Cabinet Secretary
Chuck Shulock, CARB
John Moffatt, Governor's Deputy Legislative Affairs Secretary