

## **Form Letter 1 for Comment 16 for Early Action Measures for Greenhouse Gas (ab32eam07) - Non-Reg.**

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Subject: Suggestions for Early Action Measures  
Comment:

Dear Dr. Sawyer:

As a member of three of the signing organizations below (Sierra Club California, Union of Concerned Scientists and Environment California) and a supporter of most the other organizations, I would like to add my name to this letter.

Sincerely,

David Coale

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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 a measure with such significant GHG emission reduction potential as the low carbon fuel standard included on your priority list.

Given California's ongoing challenges in addressing our air pollution problems, and the opportunities of many GHG reduction strategies to simultaneously reduce global warming pollution as well as toxic and criteria pollutants, we encourage you to thoroughly explore options to expand the early action measures noted in your draft report released on April 20, 2007.

Specifically, we ask that you consider the following proposals.

Move Heavy Duty Emission Reduction Measures to Group 1 (currently listed in Group 2)

ARB should analyze potential GHG reductions from every diesel regulation as part of the rule development process, and incorporate specific GHG reduction measures into rules where feasible. Truck GHG reduction measures (e.g., for private truck fleets and port trucks), however, warrant special attention and specifically, inclusion as an early action measure. Vehicle technologies to reduce GHG emissions and increase efficiency have already been developed under EPA's SmartWay Transport and include:

single wide tires, trailer aerodynamics, automated tire inflation and low-viscosity lubricants. These requirements are commercially available and would not delay the diesel rulemaking schedule.

Add a Cement Efficiency Early Action Measure Under ARB to Group 1

We urge CARB to adopt energy efficiency requirements for cement manufacturing facilities as an early action measure. While we support the BT&H blended cement measure listed in the CAT early action measure list, this measure addresses specifications for the composition of cement, whereas we are urging CARB to look at GHG emission requirements for cement manufacturing facilities, particularly in light of the fact that ARB has additional authority to control sources of mercury emissions under its toxic air contaminant program..

Add a Measure for Anti-Idling Enforcement

In addition, we ask you to add to Group 2, implementation of an expanded diesel anti-idling enforcement program with at least double the number of dedicated field enforcement staff to ensure that appropriate resources are available to provide consistent and widespread enforcement of current anti-idling regulations for on- and off-road vehicles.

Provide Firm Deadlines and Commitments for Measures Contained in Tables 2 & 3

While we are encouraged to see a much broader scope of potential emission reduction measures highlighted on your Tables 2 & 3, we would like to see firm commitments and more specific deadlines for these measures. Specifically, we believe the port rules are of particular importance. Adoption dates for these rules, including shoreside power among others, must not slip on the expectation of regional efforts to clean up port pollution.

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 ARB to help ensure enactment of a comprehensive program that meets all of the goals of the statute. We thank you for your consideration.

Sincerely,

David Coale

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

Rachel McMahon, Center for Energy Efficiency and Renewable Technologies

Tim Carmichael, Coalition for Clean Air

Joel Bush, Communities for Clean Ports

Tam Hunt, Community Environmental Council

Jason Barbose, Environment California

Devra Wang, Natural Resources Defense Council

Michelle Passero, Pacific Forest Trust

Matt Vander Sluis, Planning and Conservation League

Bill Magavern, Sierra Club California

Patricia Monahan, Union of Concerned Scientists

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