



December 7, 2009

Mary Nichols
Chairman, California Air Resources Board
1001 I Street
Sacramento, CA 95812

Subject: Proposed Refrigerant Management Program

Chair Nichols,

Please accept this letter of support for the proposed Refrigerant Management Program (RMP) scheduled for consideration by the board on December 10, 2009. After full implementation, this program will reduce emissions of High Global Warming Potential Gases (High GWP) from refrigeration processes throughout California, saving businesses in the aggregate over 19 million dollars and 8 million tons worth of carbon dioxide gas annually. Compared to other efforts under the scoping plan, the RMP has the sixth most emissions reductions attributed to it.

Maintaining California's progress towards reduced greenhouse gases is of tremendous importance, and will require a thoughtful package of laws, incentives, public education and participation, and careful long-term planning. The RMP program is an important component of this package and should be implemented without haste. By requiring businesses to register their units with the state, find and repair leaks of refrigerant, and use best management practices, the RMP will save money and reduce California's GHG emissions inventory by a demonstrable amount.

While the proposed RMP should be seen as a step in the right direction, CARB should also consider the regulation as a conservative first attempt to reduce high GWP gases – a step which would benefit both from some fine-tuning and a significant follow-up effort. Specifically, the CARB board should:

- Consider revising the proposed regulation to speed up implementation for medium and small unit registration and reporting. By eliminating the staggered facility registration requirements for medium and small unit operators, CARB could achieve higher aggregate reductions and increased the overall monetary savings of the program.
- Ensure sufficient resources are available for CARB and local air districts to run significant public education, outreach, and training campaigns. Without a strong public outreach effort combined with robust enforcement program, newly regulated entities are likely to suffer high non-compliance rates and undermine success of the RMP effort.
- Develop new incentive and technology innovation programs to inspire development and deployment of refrigeration systems that contain less overall high-GWP gases and systems that contain zero-GWP gases. Such technology is increasing in availability and prevalence

both in the US and abroad, and California's regulatory structure should act as a catalyst for putting the state at the forefront of innovation.

The RMP as an essential component of the AB 32 package of early action measures and should be passed to ensure as many reductions can be made quickly and at low cost to the state. While potential modifications can and should be made to improve the environmental performance of the regulation, the agency should be commended for creating this first of its kind rule dedicated to reducing emissions of GHG's.

Thank you for your time and consideration,

Sincerely,

Andy Katz, MCP
State Government Relations Director
and Director of Air Quality Advocacy
Breathe California

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