

Natural Resources Defense Council
111 Sutter St., 20th Floor
San Francisco, CA 94104

Union of Concerned Scientists
2397 Shattuck Ave. # 203
Berkeley, CA 94704

January 21, 2009

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: SUPPORT for Early Action Measure on High-GWP Small Can Refrigerants

Dear Ms. Nichols:

On behalf of the undersigned organizations, we would like to express our strong support for the proposed regulations on small can refrigerants. Based on our review of the proposed regulations, we believe that this is a practical and cost-effective solution to reduce greenhouse gases from high-GWP chemicals.


Reducing emissions of greenhouse gases from the high-GWP sector is critical element of California's strategy meeting its targets called for under AB 32. In the Scoping Plan, CARB committed to adopt a strategies including reducing emissions from both mobile and stationary sources. It includes elements that address emissions from new, in-use, as well as sources at the end of their life. Collectively the high-GWP strategies in the Scoping Plan are estimated to produce about 20 MMTCO₂E in 2020 with the prospect for further reductions as lower-GWP alternatives become available.

With respect to the small can regulation, we commend the CARB staff for working with diverse group of stakeholders to arrive at a practical, cost-effective regulation that can serve as a model for others to follow. A deposit fee on cans is a common sense, proven approach to promote greater consumer responsibility for management of products that contain chemicals that are dangerous to the environment, such as lead acid batteries. CARB staff estimates the overall cost per ton to be just \$11 per ton of CO₂-equivalent.

Though we believe that ultimately we must transition to extremely low-GWP alternative refrigerants, we recognize the need for bridge strategies to better manage the current use of high-GWP refrigerants. We believe that the proposed regulation represents a creative approach for achieving near-term reductions that are critical for the state to meet its 2020 greenhouse gas emission reduction goals. We look forward to working with the CARB as it develops other high-GWP strategies to achieve the ambitious targets that have been set.

Sincerely,


Roland J. Hwang
Vehicles Policy Director
Natural Resources Defense Council


Don Anair
Senior Vehicles Analyst
Union of Concerned Scientists

CC: Lynn Terry, Richard Corey