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Environmental Defense Fund
Sierra Club California
Coalition for Clean Air
American Lung Association of California
Planning and Conservation League

September 5, 2008

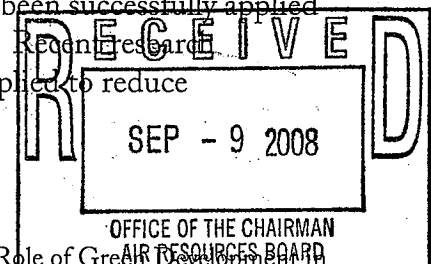
Mary Nichols
Chairwoman
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairwoman Nichols:

Some of the organizations on this letterhead have supported the recently passed SB 375 (Steinberg); others have taken no position. In either case, we are in agreement that the bill's provisions alone do not fully address approaches the California Air Resources Board should implement to meet AB 32 goals.

Should SB 375 be signed by the governor, we encourage you to act swiftly to ensure its effective implementation. CARB will need to expand and significantly strengthen the transportation and local government strategies in the draft scoping plan to support the incentives and new regional planning framework included in SB 375. For example, CARB must require the adoption of strong state targets for the land use sector and strong regional targets for local governments. In addition, CARB must incorporate more proven transportation measures in the scoping plan that will reduce vehicle miles traveled, such as indirect source controls and increased support for transit at the state and local level.

While all these strategies are important, we would like to call your attention especially to the clear benefits of indirect source controls. Such controls have been successfully applied to reduce criteria pollution, especially in the San Joaquin Valley. Recent research indicates that the San Joaquin Valley rule could be effectively applied to reduce greenhouse gas emissions as well.¹



¹ See Lawrence Frank's "Reducing Global Warming and Air Pollution: The Role of Green Development in California," July 2008: http://edf.org/documents/8046_ISR-CO2review-FINAL-070208.pdf

CARB should use its authority to require the state's air districts to adopt indirect source rules to control greenhouse gas emissions linked to new development. The agency should develop guidelines for those locally adopted rules to ensure that the local rules achieve real reductions, are fairly designed, and are consistently applied. Doing this would allow reductions to begin accruing as early as 2012/2013, and would provide additional criteria pollutant control benefits as well. Indirect source rules should be included in the final scoping plan as a required, certain, and near-term measure.

Should you have any questions about this, please contact any of us on this letter. We look forward to further discussions.

Sincerely,

Kathryn Phillips
Environmental Defense Fund

Bill Magavern
Sierra Club California

Tim Carmichael
Coalition for Clean Air

Bonnie Holmes-Gen
American Lung Association of California

Tina Andolina
Planning and Conservation League

Cc: James Goldstene, ARB Executive Officer