

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

October 24, 2007

**Re: Support for Expanded List of Early Action Measures**

Dear Chairman Nichols,

We commend the California Air Resources Board (ARB) staff for its proposal to expand the list of early action measures under the Global Warming Solutions Act (AB 32.) These measures will be essential to begin emission reductions as quickly as possible, while the state works toward developing the broader 2009 scoping plan to meet the 2020 emission limit.

We strongly support the measures included on the proposed expanded early action measure list. In particular, we commend ARB staff for including measures that will reduce global warming pollution, cut toxics pollution and improve air quality at the same time. For example, we strongly support the Green Ports measure (that will require container ships at ports to turn off their dirty engines) and the SmartWay Truck measure (that will reduce fuel used by trucks); these measures will reduce global warming pollution, smog-forming pollutants and toxic diesel soot and result in immediate public health benefits. We also strongly support the Cement Energy Efficiency measure on the "Group 2" list. This measure will result in less global warming pollution as well as lower emissions of toxic mercury.

We were very pleased to see the diesel anti-idling enforcement measure included, and firmly agree with staff's conclusion that enhanced enforcement is needed to assure a high level of compliance with existing law. We also strongly support the inclusion of the forest protocol measure as a first step for reducing emissions from the forest sector on private lands, and believing that it will be strengthened with time and implementation, support its adoption at the October board hearing. Additionally, we are encouraged to see the focus on high global warming potential sources, including the measure to undertake collaborative research to better understand how the state can reduce greenhouse gas emissions from nitrogen land application.

We commend CARB staff on the detailed analysis of each of the recommended measures presented in the Appendices of the draft report, and appreciate the hard work that has gone into this effort to date. We look forward to continuing to work with you to cut global warming pollution and meet or exceed AB 32's emissions limit.

Sincerely,

Bonnie Holmes-Gen  
American Lung Association of California

Scott Smithline  
Californians Against Waste

V. John White  
Center for Energy Efficiency and Renewable Technologies

Tam Hunt  
Community Environmental Council

Jason Barbose  
Environment California

Karen Douglas  
Environmental Defense

Danielle Fugere  
Friends of the Earth

Devra Wang  
Natural Resources Defense Council

Michelle Passero  
Pacific Forest Trust

Bill Magavern  
Sierra Club-California

Louis Blumberg  
The Nature Conservancy

Rachel Dinno  
Trust for Public Land

Don Anair  
Union of Concerned Scientists

cc: Sec. Linda Adams  
ARB Board Members  
Tom Cackette, ARB  
Chuck Shulock, ARB  
Deputy Sec. Eileen Tutt