

April 7, 2010

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S. William Becker

The Honorable John Kerry  
United States Senate  
218 Russell Senate Office Building  
Washington, DC 20150

The Honorable Lindsey Graham  
United States Senate  
290 Russell Senate Office Building  
Washington, DC 20150

The Honorable Joe Lieberman  
United States Senate  
706 Hart Senate Office Building  
Washington, DC 20150

Dear Senators Kerry, Graham and Lieberman:

On behalf of the National Association of Clean Air Agencies (NACAA) – the association of air pollution control agencies in 52 states and territories and more than 165 metropolitan areas across the country – we write to offer our perspectives on the climate change legislation that you are currently drafting.

Global warming is one of the most pressing environmental issues facing our generation. According to the world's leading climate scientists, global warming is already affecting our planet and is projected to cause severe impacts. The warming experienced to date has caused widespread melting of snow and ice, rising Arctic temperatures, widespread changes in precipitation levels, rising global mean sea level and extreme weather events such as droughts, heavy precipitation, heat waves and more intense tropical cyclones. Continuing increases in carbon dioxide concentrations will lead to more heat waves, heavy precipitation (including more intense storms such as hurricanes) and droughts in the future, as well as further rises in sea level and acidification of the oceans. In addition, these scientists have concluded that 20 to 30 percent of plant and animal species are at increased risk of extinction if increases in global average temperature exceed 1.5 to 2.5°C. Projected health effects include the increased frequency of cardiorespiratory diseases due to higher concentrations of ground-level ozone and increased deaths, disease and injury due to heat waves, floods, storms, fires and droughts.

Accordingly, NACAA strongly supports the adoption of a mandatory economy-wide greenhouse gas (GHG) emission reduction

program with quantifiable and enforceable limits that provides cost-effective means for reducing GHG emissions. The goal of such legislation should be to reduce U.S. GHG emissions substantially below current levels in order to lessen dangerous anthropogenic interference with the climate, and the legislation should include short, medium and long-term GHG emission reduction targets.

While any federal program should be sufficiently stringent to substantially reduce GHG emissions, federal legislation should not preempt state or local governments from taking more stringent actions, especially in light of the past leadership and innovation demonstrated by state and local officials in reducing GHG emissions. It is therefore critical that future global warming legislation preserve the rights of states and localities to adopt, among other things, energy efficiency requirements, renewable portfolio standards, transportation planning measures, vehicle GHG emission standards, and regional or state-wide emission caps on industrial and other major GHG sources. It is also imperative that federal legislation provide state and local governments with the authority to “retire” allowances so that they can ensure that the measures they take to reduce GHG emissions in their jurisdictions do not result in emission increases elsewhere.

Finally, a successful national global warming regulatory program must be predicated on a strong local-state-federal partnership. In order for our nation to meet our GHG emissions reduction targets, we must ensure that all levels of government are fully engaged in the design and implementation of this program. Accordingly, the bill must also acknowledge that state and local air pollution control agencies have a key role in implementation of the program. We recommend that the Senate bill explicitly recognize and fund the important role these agencies will play, at a minimum, in monitoring, inspections, enforcement and verification, and in working with the U.S. Environmental Protection Agency to design the implementation program.

As you work to complete a global warming bill, we hope you will give serious consideration to NACAA’s perspectives and recommendations. If you have questions or if we can be of any assistance, please do not hesitate to contact either of us or S. William Becker, NACAA’s Executive Director.

Sincerely,



Larry Greene  
Sacramento, California  
NACAA Co-President,  
Co-Chair, NACAA Global Warming Committee



Stuart A. Clark  
Washington  
Co-Chair,  
NACAA Global Warming Committee