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**Environmental Justice Groups File Comments with the California Air Resources Board,  
Offer Alternatives to Cap and Trade to Combat Climate Change**

Today Communities for a Better Environment (CBE), along with other environmental justice groups, will submit comments and recommendations to the California Air Resources Board (CARB) as to how to best implement California's landmark 2006 Global Warming Solutions Act, which aims to reduce California's greenhouse gas emissions to 1990 levels by the year 2020. The board will consider CBE's comments, along with others, during an August 24<sup>th</sup> public hearing in Sacramento.

In a letter to Mary Nichols, Chair of the California Air Resources Board, Communities for a Better Environment cites studies that analyze the failure of so-called "cap and trade" programs to reduce greenhouse gas levels and presents a list of alternative recommendations. CBE opposes CARB's present emphasis on "cap and trade" solutions to reduce greenhouse gas emissions, rejecting it as ineffective and burdensome to the low-income communities disproportionately affected by pollution.

A legal win four months ago re-opened the door for CBE and the public to weigh in on CARB's process for deciding on an approach to reduce greenhouse gas emissions. San Francisco Superior Court Judge Ernest Goldsmith ruled in March that CARB's analysis of different approaches to the implementation of AB 32 had too narrow a focus on "cap and trade."

Some key points of CBE's submission to the Air Resources Board:

- Studies by Columbia University and the International Energy Agency (IEA) examined cap and trade -programs wherein government sets a "cap" or limit on levels of greenhouse gas emissions permissible, then issues credits to companies that allow them to emit a certain amount of greenhouse gases and buy more if they exceed the limit. The Columbia and IEA studies found that free credits, over-allocation of credits, susceptibility to fraud and manipulation and other flaws have led to failure in meeting greenhouse gas reduction goals.
- A study by researchers at the University of Southern California, in collaboration with researchers at the University of California Berkeley and Occidental College, found that cap and trade policies could make air pollution hotspots worse and scuttle other opportunities to reduce local pollution.
- Alternatives to cap and trade that include direct pollution controls could achieve greenhouse gas reduction targets and reduce levels while reducing emissions of other pollutants. CBE's letter to CARB includes a table of cap and trade alternatives, including, among others, industrial energy efficiency improvements, industrial methane reductions and clean electricity for refineries. The table also breaks out the amounts of greenhouse gas reductions that would result from each measure.
- CBE's research also shows that worsening crude quality in the state could add another 20 million tons per year of CO<sub>2</sub> by 2020 if not addressed, but with crude quality limits, it could reduce emissions by 8 million tons per year. CARB has not addressed this.

Communities for a Better Environment is a California environmental justice organization that uses research, grassroots organizing and legal approaches to address the disproportionate impact of pollution on California's low-income neighborhoods and many African-American, Latino, Asian-American and Native American communities.