April 17, 2015

TO: Members, Senate Environmental Quality Committee

FROM: California Chamber of Commerce
African American Farmers of California
Agricultural Council of California
American Forest and Paper Association
American Wood Council
Brea Chamber of Commerce
Building Owners and Managers Association
California Agricultural Aircraft Association
California Association of Nurseries and Garden Centers
California Business Properties Association
California Cattlemen's Association
California Cotton Growers Association
California Cotton Ginners Association
California Dairies, Inc.
California Farm Bureau Federation
California Fresh Fruit Association
The California Chamber of Commerce and above listed organizations must respectfully OPPOSE SB 32 (Pavley), which has been labeled as a JOB KILLER. SB 32 will increase the cost to California businesses, make them less competitive and discourage economic growth by mandating a reduction in greenhouse gas emissions to 80% below 1990 levels by 2050 with no consideration of the economic side effects.

AB 32 was passed and signed into law in 2006 to reduce greenhouse gas emissions to 1990 levels by 2020, equivalent to a 30% reduction in emissions compared to a “business as usual” trend. Through a combination of command-and-control and market measures, along with a deep persistent economic recession, California is capable of meeting that goal. However, what are not known is whether these goals have been met in a cost-effective manner, and what the economic and environmental side effects have been.

While we appreciate the need to address climate change, we should have the opportunity to know what has worked with the implementation of AB 32 before creating additional climate change mandates. Post-2020 climate policies need to be made with the aid of rigorous, objective and impartial analysis of the costs, impacts, benefits and alternatives for moving forward. The Legislature deserves a robust, informed analysis and to be informed before giving CARB carte blanche authority to move forward.
Before any additional greenhouse gas emission reduction targets are set, there must be a credible and independent marginal cost analysis on the strategies adopted thus far in order to educate and guide greenhouse gas emission reductions post 2020. This will allow the Legislature to make informed decisions, provide appropriate guidance to regulatory agencies, and effectively oversee agency implementation to ensure that the costs and benefits of policy choices are realized.

Before extending out greenhouse gas reduction mandate beyond 2020, the Legislature should independently evaluate the cost and benefit of the state’s current climate change programs to better understand what has and has not worked. Therefore, we must **OPPOSE SB 32 (Pavley)** as a **JOB KILLER**.

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cc: Martha Guzman-Aceves, Office of the Governor  
The Honorable Fran Pavley  
Rachel Wagoner, Senate Environmental Quality Committee  
Tiffany Roberts, Senate Republican Caucus  
Senate Office of Floor Analyses  
District Offices, Members, Senate Environmental Quality Committee