**FLOOR ALERT**

**SB 32 (PAVLEY) – SUPPORT**

On behalf of the Association of Environmental Professionals (AEP) Climate Change Committee and Legislative Review Committee, we write to lend our support for SB 32 (Pavley).

AEP is a non-profit organization of California’s environmental professionals from public agencies, the private sector and nongovernmental organizations. For over thirty years, AEP has dedicated itself to improving the expertise of its membership, educating the public on the value of California’s environmental laws, management of our natural resources, and promotion of responsible land use. AEP members include leaders of climate action planning across California actively supporting California cities and counties in reducing GHG emissions and planning for resiliency to climate change.

A 2030 statewide reduction target adopted by the legislature is needed now.

Cities and counties across the state are struggling to meet CEQA requirements for the review of GHG emission impacts in large part due to the uncertainty in terms of what is legally required. In the past, an analysis of consistency with the 2020 target in AB-32 was enough. But the California Supreme Court, in a late 2015 ruling, hinted that an analysis of horizons beyond 2020 may be required soon. Some intervenors are now asking for projects to analyze impacts out to 2030 or later based on GHG targets in prior Executive Orders (e.g. S-03-05 and B-30-15) but the legal effect of post-2020 targets has been questioned due to their lack of legislative foundation.

The legislature can remove that uncertainty by establishing a 2030 statewide target. This will help cities, counties and the proponents of new development supporting California’s continued economic growth to know what milestone to be considering in doing CEQA analysis.

More importantly, a 2030 statewide target will also establish the new horizon for doing Climate Action Plans (CAPs). CAPs have been instrumental for local and regional action in support of statewide GHG emissions reductions strategies. But most CAPs are currently based on 2020 GHG emissions reductions targets derived from the AB-32 target. A legislative target is needed so that CAPs can more accurately assign local and regional responsibility vs. state responsibility for achieving GHG reductions post-2020. Qualified CAPs are used for streamlining of GHG analysis CEQA documents, and have helped to ensure that each local or regional jurisdiction is contributing its “fair share” towards GHG emissions reductions efforts statewide. AEP urges the inclusion of a 2030 GHG reduction target and passage of SB 32 accordingly.

**We urge you AYE vote on SB 32.**