



# CLEAN WATER ACTION

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June 14, 2006

Members of the Energy Planning Advisory Board  
C/O Kim Smith, NH PUC  
Concord, NH

Re: Stakeholders Forum submission for June 23, 2006; recommendation for a climate action plan

Dear Energy Planning Advisory Board:

On behalf of Clean Water Action's 5,000 New Hampshire members, I would like to offer the following comments in support of a recommendation requiring relevant state agencies to produce a climate action plan for New Hampshire. As the Board will no doubt hear other presentations on global warming issues and the need state energy policy to address the reduction of greenhouse gases, I would like to focus these comments on the origins and purpose of this climate action plan recommendation.

Clean Water Action began its advocacy on behalf of climate action in 1998, in the context of so-called "four-pollutant" legislation to clean up old fossil-fueled power plants, culminating in the 2002 NH Clean Power Act as well as subsequent legislation. In 2002, we helped form the NH Climate Action Coalition, part of a regional program to bolster the Conference of New England Governors and Eastern Canadian Premiers (NEG-ECP)'s efforts to address greenhouse gas reduction. Their Action Plan, completed in 2001 under the chairmanship of New Hampshire Governor Jeanne Shaheen, called for among other key efforts, the creation of an action plan by each state or province to "carry on its own planning for climate change gas reductions." (pg. 2, Preamble) Further, the Action Plan states that "each jurisdiction will develop its own plan, programs and policies" and "will choose the measures and programs that will benefit its own economy and work most smoothly for its citizens and businesses." (pg 9) The full NEG-ECP Action Plan is available on our regional coalition's website: [www/newenglandclimate.org](http://www/newenglandclimate.org).

Now NHDES may argue that its “Climate Change Challenge” report, a laudable effort released in late 2001 but developed prior to the NEG-ECP agreement, might suffice to meet this requirement, yet its subtitle (“Actions NH Can Take to Reduce Greenhouse Gas Emissions”) makes it clear that this is not an action plan, but a laundry list of possible activities to address the problem. I was involved in the early stages of the stakeholder workgroup developing it, and it was made clear to participants from the outset that it was not intended to be a binding plan of action.

In 2004, our regional coalition began developing an annual “report card” to assess how each of the NEG-ECP states and provinces were progressing in their climate action efforts, using their own stated criteria – 8 “action items” – to grade them. In comparing notes among advocates in each of the New England states, it became clear that in the area of planning, New Hampshire stood almost alone in not having progressed at all in developing a true state action plan, with Vermont being the only other exception at the time among New England states. (Vermont has since passed legislation to set up a commission to develop a plan.) Given the breadth and diversity of sources of greenhouse gases in our industrialized society as well as complex responses required to address them, it is imperative that a comprehensive and coordinated approach be taken for effective action, with an essential first step being the development of a plan of action. This point is clearly echoed in the preamble of the NEG-ECP Action Plan.

To follow up on this glaring deficiency in New Hampshire’s response to the NEG-ECP agreement, our state coalition sent a letter in June, 2004 to DES Commissioner Michael Nolin requesting that DES begin developing a climate action plan. His response described in detail many important and worthwhile efforts the Department had completed or initiated to address greenhouse gas reduction, yet he left it to the Legislature to “provide direction” in producing such a plan. He stated that “DES would most effectively be able to draft and execute a climate change plan that contains commitments to specific strategies and timelines with the support of policy that has been debated and adopted by the Legislature and signed by the Governor.” He concluded by saying that “DES looks forward to working with you and the Legislature to provide a prudent and proper direction to reduce greenhouse gas emissions.”

Last fall, we asked Rep. James Ryan to draft legislation (HB 1507) to get the planning process underway. The specific principles proposed to be incorporated in the State’s action plan were derived from the ten principles for climate action developed by our regional coalition. While some of the actions described are already being pursued by State agencies (e.g., Governor Lynch’s executive order on state government energy efficiency) and others are the subject of other legislation before you this year, we think it’s vitally important DES produce a comprehensive plan that addresses all these areas in a coordinated way.

Unfortunately, HB 1507 was voted inexpedient to legislate in committee, yet the ITL report noted that “several existing bills and studies this year will afford more participation and deliberation. We encourage the sponsor to work with the various committees working on these policies.” I gather that one of those “studies” is the work of this body, so I urge you to consider recommending to the Legislature and/or the Governor that a climate action plan be developed for New Hampshire, so that we can join the other New England states in taking a comprehensive approach to addressing this paramount problem.

Thank you for the opportunity to address the Board on this critical matter. We look forward to working with the Board and DES to enable the production of a strong action plan to address our state's stake in what is arguably the most important long term environmental as well as economic issue facing the Granite State as well as the rest of the planet.

Sincerely

Doug Bogen  
NH Program Director  
Clean Water Action