Unfortunately, it turns out that I can’t share the document language that we are currently working on. Here are some notes and references that you may find useful in lieu of the one-pager that we discussed (and as a supplement to Hanh’s document).

* The EPA issued two rules that ‘delisted’ HFC-based refrigerants, aerosol propellants, and foam-blowing agents in newly-manufactured products and equipment in specific end-uses where alternatives are available. The prohibitions started going into effect in 2016.
* Canada adopted consistent rules in October 2017. California adopted their rule in March, 2018 and has indicated that they will seek additional policies.
* The 2015 EPA rule was vacated in 2017 and denied rehearing in 2018. On remand, EPA issued a guidance that indicated that it will not pursue the 2015 rule. The 2016 rule is held in abeyance and EPA has indicated that it plans to revisit this rule as well.
* The dockets for the EPA rules included emission estimates, costs analyses, and economic impacts assessments. EPA estimated total costs of up to $144.6 million for both rules (High Scenario, 7% discount rate), and this is nationwide and over the lifetime of affected equipment. A state’s portion of these costs could be estimated using the portion of US population in that state. However, parts of the EPA rules were already in effect by the time the rules were vacated, so these costs were already incurred. Plus, your state may not have the types of manufacturers that are covered by the EPA’s estimates. The majority of the costs were associated with nine businesses that manufacture stationary air conditioning equipment. Note, the CARB rule does not include the stationary air conditioning sources and the SNAP prohibitions on those also don’t go into effect until 2024.
* Overall, the EPA estimates determined that there would be no costs to the majority of businesses because the greatest number of affected businesses were retail food operations. The SNAP rules allow those entities to use other lower-GWP HFC refrigerants that can ‘drop-in’ to existing equipment. EPA also determined that there would be no significant impact on small businesses because 99% of the small businesses affected would have zero costs and only 69 small businesses nationwide would incur costs greater than 3% of annual sales (if you add the estimates form both sets of rulemaking documents).

[CARB Staff Report](https://www.arb.ca.gov/regact/2018/casnap/isor.pdf)

[EPA 2015 Rule Docket](https://www.regulations.gov/docketBrowser?rpp=50&so=ASC&sb=title&po=0&dct=SR&D=EPA-HQ-OAR-2014-0198)

[EPA 2016 Rule Docket](https://www.regulations.gov/docketBrowser?rpp=50&so=ASC&sb=title&po=0&dct=SR&D=EPA-HQ-OAR-2015-0663)

Also - [here is a link](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.arb.ca.gov_cc_shortlived_shortlived.htm&d=DwMGaQ&c=lDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns_w&r=dtgRKhICy_2dtDV3vLZmZ8Io87alDzP8yYNYunqDrig&m=Vm788R-5ddAshEtIVKFtkSxJiDB0tM5y--Vdbf2UIOI&s=ZRJFTVsPcMIKgvleTJeiDI9Kd9GZRrmwEM5KSXcCP6U&e=) to California's SLCP Reduction Strategy.  It includes sections on HFCs, which might provide helpful background for your deliberations.  It also includes an economic analysis showing very low-cost emissions reductions available, which is summarized in the main report and more detail on that is included in Appendix.

Short-Lived Climate Pollutants

Reducing super pollutants - such as methane, hydrofluorocarbons (HFCs) and black carbon – can avoid as many as 2 million premature deaths and 52 million tons of crop losses globally each year.  Action on super-pollutants also presents a tremendous economic opportunity for U.S. companies at the cutting edge of developing solutions.

Building on our commitment under the Short-Lived Climate Pollutant (SLCP) Challenge, we are **launching an SLCP Action Plan** that provides a roadmap for collectively reducing our SLCPs emissions by as much as **40-50 percent by 2030**.  We also commit to **develop and implement state-specific strategies** on how we will get there.

**To demonstrate our commitment to lead, the states of [XYZ] announce their intention to propose regulations, and [ABC] to consider regulations, in 2019 to prohibit the use of high-warming HFCs, consistent with the 2015 and 2016 EPA SNAP Rules.**These proposed regulations will be substantially consistent across these states and with the regulations finalized or already proposed by California. The U.S. Climate Alliance commits to accelerating the replacement of climate warming HFCs through voluntary and regulatory approaches, and will work together in the coming year to explore actions appropriate for each of our states. \

OR

Alternately, you could add a sentence after “SNAP Rules” like “Additionally, [XYZ states] will consider regulatory approaches consistent with SNAP in the year ahead, and cooperate to share their experiences across the U.S. Climate Alliance.”