

While some politicians have called publicly for the suspension of AB 32 until the economy recovers (see [here](#) and [here](#) for details), a more behind-the-scenes effort to undercut the implementation of California's global warming bill is also taking place. The AB 32 Implementation Group ("IG") [says](#) it "represents large and small business that are vital to California's economy and that provide hundreds of thousands of jobs." It [describes](#) its mission as providing

a constructive voice in the process to implement AB 32 and ensure that the greenhouse gas emission reductions required under AB 32 are achieved while maintaining the competitiveness of California businesses and protecting the interests of consumers and workers.

"Constructive" is apparently in the eye of the beholder. The co-chair of the Implementation Group has [testified](#) that she supports suspending the implementation of AB 32 (though says her testimony was in her capacity as the vice-president of the California Manufacturer's Association, not as part of the Implementation Group). The group has also come under fire by some of its members for working to undercut AB 32 rather than help implement it, reminiscent of the [controversies](#) surrounding the American Coalition for Clean Coal Electricity. For example, IG has sent a [letter](#) to CARB suggesting that a cap and trade program implemented in California will pose "economic risks for a California-only program ... includ[ing] a worsening of the overall business climate while the economy is still fragile." The implication pretty clearly seems to be that the state's Air Resources Board should not adopt cap and trade. IG's anti-AB 32 advocacy has led some of its members [to quit](#) the coalition.

Passing federal legislation to curb greenhouse gas emissions is, of course, a daunting challenge and appears to be less likely than ever with the election of Scott Brown as the new U.S. Senator from Massachusetts (despite Jonathan's [clever argument](#) to the contrary). But the California experience is an important reminder that in many ways the hard work only begins once legislation has passed. The opportunities to undermine the implementation of broad-sweeping environmental legislation are numerous, from lobbying to weaken implementing regulations to filing lawsuits to invalidate regulations once adopted to failing to provide sufficient funding to [enforce](#) regulations against violators. So far California's regulators appear to have done an admirable job in crafting regulations to implement AB 32. But groups like IG will continue to apply pressure at every stage of the process, meaning that agencies and environmental groups will need to play an ongoing role in ensuring that the state can actually meet the ambitious goals of its landmark legislation.