10. Cass Sunstein becomes regulatory czar. Sunstein is a true believer in cost-benefit analysis, the bête noire of many an environmentalist. Obama's appointment of Sunstein to oversee health and environmental regulations may put the brakes on regulatory initiatves.

9. California passes AB 758. The first mandate for energy efficiency standards for existing buildings.

8. Water wars moving east. We tend to think of water disputes as Western. But that's hanging: Georgia and Alabama fought over water allocation, while Michigan and Illinois fought over ~~endangered~~ invasive species.

7. EPA grants California's car waiver. Reversing the Bush Administration, EPA approved California's regulations of greenhouse gases from vehicles.

6. Withdrawal of the Bush Administration's ESA rule. The Bush Administration tried to reduce substantially the number of federal actions subject to review under the Endangered Species Act. The Obama Administration reversed this action, with an assist from Congress.

5. The 2008 Supreme Court Term. The worst Supreme Court Term for the environment ever**.** Five losses out of five cases.

4. EPA's endangerment finding. The government finally got around to finding the obvious: climate change is bad for your health and bad for the planet. The finding opens the door to using the Clean Air Act to address climate change.

3. Copenhagen. Much exaggerated hype followed by much exaggerated hand-wringing. The Copenhagen Accord is a step forward – how big a step, only time will tell.

2. Barack Obama took office, and the Democrats go sixty votes in the Senate. Obama seems to combine Bill Clinton's pragmatism with a dash of Al Gore's idealism on environmental issues. Whether the Democrats will succeed in capitalizing on their Senate control remains to be seen.

1. George Bush and Dick Cheney left office. Not everything was negative, but overall, Bush and Cheney headed the most anti-environmental Administration in decades. (Why, you might ask, is this the #1 development, while Obama is #2? The reason is that Bush was much more anti-environmental than Obama is pro-

environmental.)