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California Air Resources Board 1001 "I" Street Sacramento, CA 95814

Dear CARB:

The City of Oxnard is a blue-collar; minority-majority city of 200,000 located about 60 miles northwest of Los Angeles. Like most local governments today, we are struggling to provide day-to-day services with a reduced budget and loss of our redevelopment agency. We are a progressive city in terms of environmental efforts to reduce greenhouse gas (GHG) emissions, develop sustainable agriculture, affordable housing, and recycle our wastewater but our efforts are largely contingent on receiving State and Federal grants. We recently adopted a 2030 General Plan with a Sustainability Chapter and have a draft Climate Action Plan. We have not been successful on three Prop 84 grants to complete our CAP or initiate a long-overdue update of our Local Coastal Plan, both proposed in response to State encouragement.

In short, we know what to do to reduce GHG emissions. What we need is a regular source of funding to implement our programs that does not require repeated development of lengthy proposals, competition with larger and wealthier jurisdictions that can afford professional grant writers, and the repeated risk of starting a CAP-related program that, if funded, that has no permanent funding source.

The proceeds of the Cap-and Trade auctions are a recurring source of funds that should be earmarked to implement the goals of AB32. We strongly encourage that a significant minimum amount and/or fixed percentage of the Cap-and-Trade proceeds be set aside for CDBG-like formula grants based on population and economic status to city and county governments to implement policies and programs from locally-adopted Climate Action Plans. If a jurisdiction has no CAP, then CARB would have a list of approved programs such as installing PEV charging stations, insulating older buildings, installing renewable energy generating equipment, and establishing an urban forest for sequestration credits.

Thank you for the opportunity to comment.

Dr. Christopher Williamson, AICP

Principal Planner for Advance and Sustainable Planning