

RE: VCCool Comments on AB32 Scoping Plan

Ventura County Climate Care Options Organized Locally, VCCool, is a Ventura County global warming action group. Our Mission is to address climate change by promoting a green economy and sustainable lifestyle through local community action, education, effective public policy, and an inspiring proactive vision.

We are encouraged that the State of California has passed AB32 to address climate change proactively within the State. And we feel strongly that beyond the vision of AB32, the progressive, courageous, and inclusive approaches published in the Scoping Plan will in large part determine the effectiveness of the program. We believe that the lessons learned in California will be exported throughout the United States so it is critical to hear from the environmental and humanitarian communities in developing the implementation regulations to reach AB32 goals.

1. General Comment

The Scoping Plan focuses on tactical strategies to reduce Greenhouse Gases (GHG) rather than fundamental changes to our lifestyle that drive GHG. We appreciate that these fundamental changes are difficult to address as some might require changes from the public that may not be popular. However, many of these changes may lessen or even remove the need for some of the stated tactical strategies. Also, it is important to set the stage for the dialog to address these changes in order to be able to tackle these underlying issues directly at a later stage. Some fundamental changes that need to be addressed are the carrying capacity of the planet with regard to the population that can be sustained with the current lifestyle we enjoy.

1a. One lifestyle change that must be addressed is the level of consumerism that we have come to accept. This level of consumerism is directly and indirectly supported by state and local policies. One clear example of this is the reliance of local government on sales tax to fund programs. We have a dependence on sales tax as the primary funding mechanism for government which in turn leads to local government to promote retail outlets over all other forms of development. This structural funding mechanism flaw is at the root of many poor urban planning choices that increase our GHG emissions.

1b. A second fundamental change to be addressed is our population as related to the carrying capacity of our planet and our quality of life. Addressing the population may in this context should include funding for family planning and programs that promote smaller family lifestyle choices. Some family planning was previously supported by State programs that have been gradually defunded over the years. This direction must be reversed. Clearly, the avoidance of this topic has placed the burden of action on our generation, and we no longer have the luxury to continue to pass it on. This discussion must be placed squarely on the table, and be part of the Scoping Plan.

1c. Finally, the effect of our lifestyle choices is not adequately discussed in our school curriculums. There is insufficient instruction on the connection between our lifestyle choices and the sustainability of the ecosystem in our formal K-12 curriculum. A key part of gaining public acceptance of the responsibility to address climate change must come from exposure in our schools.

2. Transportation

The Action Plan indicates that 38% of our GHG are from transportation. Many of the measures to address the transportation are focused on reducing the emissions from vehicles rather than reducing the Vehicle Miles Travelled (VMT).

2a. There is insufficient emphasis on smart growth planning to reduce VMT in the Scoping Plan. Smart growth is the fundamental basis upon which alternatives to the personal automobile can be built. The design considerations underlying smart growth are well understood but rarely implemented primarily in large part due to conflicting planning requirements such as minimum parking standards, setbacks and maximum height restrictions, etc. A systematic process to change these planning codes at a local level is critical.

Zoning that segregates uses as well as economic strata is a major contributor to community design flaw that inhibits walking and bicycling for transportation. Though the scoping plan briefly mentions “mixed use,” encouragement of a statewide policy shift toward mix-use zoning is an important step to reducing GHG emissions is required.

2b. Sending the right price signals to the consumer is effective in changing behaviors curbing excessive waste, while externalizing costs is currently increasing our GHG emissions. A tax on motor fuels and a more progressive registration fee schedule for vehicles based on the engine displacement is a viable source for funding for VMT reductions. Other methods to incentivize alternatives to personal auto use would be to implement peak roadway pricing within downtown areas of major cities and to require fee-based parking at all public buildings.

2c. We support carpooling by increasing the number of highways with carpool lanes available during peak traffic hours.

3d. The bicycle should not (as is done in the current scoping plan) be grouped together with walking and public transportation. It is radically different in range, speed, and carrying capacity from both that of the walking and mass transit, and as such has very different requirements and serves a different purpose.

A leisurely speed for an average adult cyclist is 9 miles per hour, and an easy range is 5 miles one-way, 10 miles round-trip. Typical carrying capacity for a rack to fit onto a bicycle is 40 pounds. Carrying capacity for bicycle trailers range from 70 to 300 pounds. Because of this, the

bicycle is the most economic and low emissions choice for a large portion of urban dwellers' transportation needs.

Safe, contiguous bike lanes to all parts of our cities and towns, as well as connecting close metropolitan areas, should become required and intrinsic to our transportation plans. Bicyclists' requirements including safety, convenience, and bikeway funds should be equal to that of the private automobile driver. Driver education requirements should include understanding how to maneuver an automobile when there are cyclists on the road, as well as the legal way to maneuver the bicycle itself. Safe bicycle routes to schools should be required, and should be published and promoted. Bike lockers, and on-board bike storage are extremely economical ways to extend the public transportation system, and should be part of the plan.

3. Electricity

California has made great strides towards increasing the capacity of renewables in its electricity mix. These can be supported further by:

3a. Restore the incentive levels under the California Solar Initiative. This is critical if the solar industry is to achieve its million roof target. As these incentives decrease, renewables, particularly rooftop photovoltaic systems are becoming uncompetitive against utility grid power. We recognize the value of distributed generation as it preserves natural environments and improves grid reliability.

3b. Increase flexibility under net meter regulations to allow virtual net metering at different locations for an owner with multiple utility service accounts. This will allow building owners to maximize the potential for renewables at their buildings.

3c. Require utility companies to purchase "clean" energy at a premium price from electric customers who are linked into the grid and generating electricity using renewable sources.

3d. Combined metering for multiple customers should be discouraged. Each household and business needs to be able to see the costs related to their electric use, and be able to reap the benefits of their own conservation efforts.

4. Waste Management and Recycling

While recycling and waste management has been successfully addressed under AB939 in California, there is still room for improvement with respect to recycling and re-use.

4a. Ensure recycling is implemented at all public buildings, and publically supported functions such as fairs, trade exhibitions, concerts, and other events.

4b. A more active market for materials re-use has to be promoted for public and private surplus goods and re-useable wastes from remodeling and demolitions.

4c. More flexibility on the use of biosolids as soil amendments should be pursued to incentivize publically owned treatment works to be able to serve their local communities. Currently, there are excessive GHG associated with the transportation and disposal of this material.

4d. Manufacturers should be responsible for helping create and implement a cradle to cradle industrial cycle, as is done in many European countries.

5. Water

Moving water is largest use of electricity in the State of California. The loss of snow pack and the change in rainfall due to global warming puts pressure on our already over-taxed water delivery systems. This makes water conservation an area of great potential benefit.

5a. Encourage the use of municipal green waste mulch and biosolids in agriculture and landscaping. In Ventura County, Agromin and Limoneira Ranch have used municipal green-waste mulch to achieve a 30% reduction in agricultural water needs. They have also reduced use of chemical pesticides, and stopped the use of herbicides and chemical fertilizers. Nitrogen is 300 times more potent as a greenhouse gas than carbon dioxide. Typically only 50% of chemical fertilizers actually stay in the soil. An estimated 25% runs off into the water, and an estimated 25% evaporates. With 26,000,000 acres of productive agricultural land in California, the use of mulch must become part of our agricultural policy. (Note: The California Integrated Waste Management Board is currently doing a Lifecycle study of the Limoneira site as related to greenhouse gas.)

5b. Graywater code simplification is an economical and effective change that could be implemented quickly, adopted easily by citizens across California, and has been proven to be safe and effective in two other draught-ridden states in the Union.

The use of residential graywater is currently discouraged in California by complicated and expensive design and permit requirements. The removal of both the tank requirement and the permit requirement has been working successfully for years in both Arizona and New Mexico. Their simple, proven method of dealing with residential graywater would be a powerful method of conserving water and electricity, and should be included in the scoping plan.

Arizona's Graywater Guidelines:

[www.harvestingrainwater.com/wp-content/uploads/Arizona Greywater Guidelines in English.pdf](http://www.harvestingrainwater.com/wp-content/uploads/Arizona_Greywater_Guidelines_in_English.pdf)

5b. There is a lack of awareness on the native and adaptive species that can be utilized in gardens to minimize water consumption. Outreach to promote native and adaptive species in landscaping to minimize urban irrigation requirements should be implemented. Free advice on appropriate species for soil type and weather conditions should be available to the public as well as starter plants seedlings. Our agricultural extension programs through the state university systems could greatly assist us in this area.

6. Re-Localization

The Scoping Plan does not have a section to deal with the growing need to re-localize our economy in line with peak oil considerations and the lifecycle GHG emissions associated with the transport of goods across the globe. This issue has to be addressed as part of the dialog on climate change mitigation.

6a. A policy to assess the lifecycle GHG emissions associated with large quantity purchases should be considered at a State level. A policy to utilize local resources first should be implemented.

7. Building Codes

While Title 24 Energy Code is comparatively quite progressive, the California building codes and practices must be improved if we are to meet our target emission reductions. Here are two important additions that could have a major impact on the carbon footprint of new construction.

7a. Update Building Codes to promote the use of natural building materials. “Natural Building” methods (not to be confused with “Green Building” methods) typically use natural clay masonry - adobe, cob, and natural earthen plasters. Our oldest buildings are made of earthen masonry. They have outlasted many of our more modern structures surviving fire, earthquake, termites, and even floods.

Building codes have been blocking the use of this low-impact form of construction. The current code requirements remove the simplicity, economy, and low carbon footprint, of natural building and favor the use of incompatible, energy-intensive materials embedded throughout

7b. While LEED and other “green” standards are vital to changing the carbon footprint of our buildings, the simple act of downsizing our homes and business buildings, as well as increasing multi-family housing options, would leave more open space, provide housing to more people per footprint, and drastically reduce the carbon emissions for both building and maintaining homes and businesses. In 1940 the average home was less than 1,000 square feet, now it is over 2,500 square feet. We need incentives and restrictions to encourage a swift move toward more reasonable building sizes as part of the AB32 scoping plan.

We appreciate the opportunity afforded by the Air Resources Board to present our suggestions on Scoping Plan and look forward to the development of these implementing regulations.

VCCool - Ventura County Climate Care Options Organized Locally