

August 8, 2008

Mary Nichols
Chair, California Air Resources Board
Sacramento, CA 95814

**RE: City of Sacramento Comments on Climate Change Draft Scoping Plan
Appendices: Local Government Actions and Regional Targets.**

Dear Chair Nichols:

On behalf of the City of Sacramento we would like to thank you for the opportunity to comment on the California Air Resources Board's (ARB) Draft Scoping Plan Appendices (Appendices). We appreciate that the State is taking a leadership role in climate change and hope to provide input that is helpful to the process. Below are the City's major comments on the Appendices. Please feel free to contact Yvette Rincon at 916-808-5827 if you have any questions.

General Comments

The City of Sacramento has the following general comments:

1. It is unclear what the real deadlines are for comments. The August 11, 2008 deadline to submit comments on the entire Appendices was unrealistic. It did not give local government adequate time to review and comment on the Appendices. Given the limited time, the comments below focus only on the Local Government Actions and Regional Targets section. The City will submit additional comments on the other sections before the October 2, 2008 deadline.
2. Retaining local control over land use is a significant concern to the City of Sacramento.
3. We strongly encourage ARB to adopt an incentive based model for cities to achieve the regional GHG reduction targets as opposed to a model of mandates and/or regulations.
4. Finally, cities across the State are different and have unique challenges and opportunities, therefore, we would strongly oppose a one size fits all approach to reducing greenhouse gas emissions.

Local Government Actions and Regional Targets

The City is generally supportive of the model proposed in the Appendices insofar as it calls for the development of regional targets. However, we also believe that emission reductions related to land use and transportation planning are likely to play a larger role in achieving the 2050 goal than the 2020 goal. This is because the changes related to land use which encourages infill development will be incremental. The majority of residences

and jobs are located within the existing built environment and will have the same or similar traffic patterns well past 2020 regardless of the success any new infill development enjoys in reducing emissions.

Nevertheless, the State's approach raises significant concerns for the City that need to be addressed if the City is going to be able to meet the State's requirements. It is our understanding that ARB would require local governments to meet a greenhouse gas (GHG) reduction target through land use and transportation planning. At first blush, it appears that the target may be achievable, however, the devil is in the details.

The most critical factor for the City to meet the State's GHG target is having a realistic and achievable GHG reduction target and a fair and reasonable process for tracking and reporting progress toward the target. The second most critical factor is having fiscal resources. For the City of Sacramento to meet the State's requirement we believe we do so by implementing the City's General Plan. The City's General Plan is consistent with SACOG's Blueprint and if implemented we believe we can achieve a reduction in per capita vehicle miles traveled. However, implementing our General Plan will require significant funding resources for infrastructure, revamping the zoning code, and tracking and reporting our progress. In addition, the City's success is also dependent on the State properly investing in the operation and expansion of Regional Transit thus giving our citizens real alternatives to transportation.

Determining Regional and Local GHG Reduction Targets

It is absolutely critical that local governments are allowed to be part of the decision making process for determining local GHG reduction targets and having input on the tracking and reporting process, especially if there will be penalties for not meeting the target. As we mentioned above, in order for the City to meet the State's GHG target it needs to be a realistic target and the tracking and reporting of progress needs to be fair and reasonable. It is unclear from the Appendices how the regional targets are going to be determined and how they will be handed down to local governments. It is also unclear how ARB will determine the local and regional baseline GHG emissions and account for reductions in GHG emissions by local governments.

Adequate Funding Is Critical

With the economic downturn and cities, states, and the nation facing budget challenges, funding General Plans or programs to implement the changes that need to happen to meet the State's GHG target is going to be a serious challenge. We recognize that there will be an associated long term savings as we plan and grow smartly, nevertheless, the upfront investment that is required will be difficult, at best, and impossible, at worst, for cities to fund. We encourage the State to think creatively, reward good behavior (such as cities whom have already invested in their general plan updates), to not fund programs at the expense of businesses alone, and allow for a phased approach that allows enough time and resources to meet the targets. We also encourage the State to continue the trend it started with Proposition 1C by funding projects that are smart infill growth.