



January 18, 2008

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Steve Church  
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**Re: Comment Letter on ETAAC Report Discussion Draft 12/21/07**

Dear Mr. Church:

On behalf of the California State Association of Counties (CSAC), we appreciate the opportunity to comment on the Draft Discussion Report of the Economic and Technology Advancement Advisory Committee (ETAAC). CSAC is an association that represents county government before the California Legislature, administrative agencies and the federal government. Representing all 58 of California's Counties, CSAC places a strong emphasis on educating the public about the value and need for county programs and services critical for healthy communities.

In November 2007, the CSAC board of directors voted unanimously to adopt a climate change policy, including guidelines regarding nine different sectors. Local governments across California are developing their own climate protection plans, demonstrating leadership through creative approaches to reducing their greenhouse gas emissions. CSAC is working with state, regional and local partners to provide education and resources and to represent local government as climate change regulations and implementation strategies are developed.

Counties recognize that climate change and the release of greenhouse gases (GHG) into the atmosphere have the potential to dramatically impact multiple aspects of human life, including our environment, the economy and public health and safety. In addition to international, federal and state efforts, CSAC advocates that local strategies are needed to protect our communities and demonstrate leadership on this important issue. CSAC supports and encourages efforts to reduce GHG emissions and the creation of a comprehensive and viable strategy to achieve these reductions.

With the governor's signature on Assembly Bill 32, the Global Warming Solutions Act of 2006, California has embarked on an ambitious program to reduce greenhouse gas emissions (GHG) to 1990 levels by 2020, through a combination of regulations and market mechanisms. With regard to suggested Strategy #5, multiple state, regional and local entities are involved in the research, planning and coordination of AB 32 implementation. Consequently, coordination is essential not only across all involved state agencies, but with all regional and local partners as well. Specifically, in regard to land use decisions, counties have a primary responsibility for basic land use decisions. Land use and development problems and their solutions differ from one area to another and require careful analysis, evaluation, and appraisal at the local government level. It is imperative

that counties be an active participant in the discussions and dialogue in the development of land use GHG reduction strategies currently under way at the state level.

### **Transportation**

As noted in your report, land use planning and development plays a direct role in transportation patterns, affecting travel demands and in return vehicle miles traveled and fuel consumption. CSAC has adopted policy recognizing the need to encourage more strategic growth and target infrastructure investments to promote such action. We offered support for AB 857 (Chapter 1016, Statutes of 2002) that placed into statute smart growth principles intended to influence state infrastructure investments and we encourage state action to follow this law. CSAC also supports the current Blueprint Planning processes occurring throughout the state through providing incentives to those cities and counties that embrace these efforts. CSAC recognizes that smart land use planning and more strategic growth will influence transportation choices across all sectors (i.e. vehicle, air and train), thus affecting a significant portion of the GHG emissions in California, estimated to be 41% from transportation alone.

With this in mind, CSAC strongly believes that any policy recommendations must consider the following principles:

- Incentives for regional blueprint and countywide plans must be provided to ensure that rural, suburban and urban communities have the ability to plan for more strategic growth and have access to revenues available for infrastructure investment purposes.
- Counties and cities must strive to promote efficient development in designated urban areas in a manner that evaluates all costs associated with development on both the city and the county. Support for growth patterns that encourage urbanization to occur within cities must also result in revenue agreements that consider all revenues generated from such growth in order to reflect the service demands placed on county government. As an alternative, agreements could be entered into requiring cities to assume portions of county service delivery obligations resulting from urban growth.
- CSAC supports measures suggested by the Climate Action Team (CAT) to achieve reductions in GHG emissions by promoting housing/jobs proximity and transit-oriented development, and encouraging high density residential development along transit corridors. CSAC supports these strategies through its existing smart growth policy for strategic growth. That policy supports encouraging new growth that results in compact development within cities, existing urban communities and rural towns that have the largest potential for increasing densities, efficiently utilizes existing and new infrastructure investment and scarce resources, and strives towards achieving a jobs-housing balance.
- With respect to incorporation of climate change within general plans and environmental documents for compliance with the California Environmental Quality Act (CEQA), analytical methodologies, thresholds of significance and other



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standards must be established before CEQA can be used as a tool to address climate change. CSAC supports a safe harbor mechanism for the interim period while such issues are addressed.

- Climate change and the reduction of GHG emissions effect many elements of local general plans. Local jurisdictions are striving to evaluate current policies and objectives that already address such issues, as well as focusing attention on the development of additional policies and actions as deemed appropriate. The establishment of baselines and other technical information and data is critical to achieving this goal.

With regard to state and local fleet requirements, CSAC supports state efforts to create standards and protocols for all new passenger cars and light-duty trucks that are purchased by the state and local governments that conform to the California Strategy to Reduce Petroleum Dependency. CSAC supports state efforts to revise its purchasing methodology to be consistent with the new vehicle standards and supports assistance to local governments for the purchase of new vehicles for local fleets that conform to state purchasing standards, are fuel efficient, low emission, or use alternative fuels.

### **Solid Waste/ Recycling**

CSAC supports ETAAC's assertion that recycling and waste prevention can reduce GHG emissions by reducing the amount of energy needed to process materials, and reducing the amount of natural resources needed to make products. Since the enactment of the California Integrated Waste Management Act in 1989, cities and counties have successfully implemented numerous programs to meet the solid waste diversion requirements of the Act. Unfortunately, obstacles exist that thwart further improvements to local recycling efforts. In particular, schools are not required to comply with the Act's diversion mandates. Given the significant amount of waste generated by schools, including colleges, we would encourage the ARB and CIWMB to support legislation that would require compliance with the state mandated diversion goals.

As noted in your report, CSAC supports requiring an owner of a multifamily dwelling to provide the appropriate recycling services for that dwelling. We also believe that the commercial sector should be required to step-up their recycling efforts, thus contributing to the overall success of a community's waste reduction goals and corresponding GHG emission reduction.

CSAC would strongly discourage the CARB and the CIWMB from pursuing any legislative change that would eliminate local government's ability to receive AB 939 diversion credit for the recycling of green waste as alternative daily cover at landfills. Instead, the focus should be on the establishment of composting markets to stimulate green waste demand.

### **Forestry**

With a significant percentage of California covered in forest land, counties recognize the importance of forestry in the context of climate change. Effectively managed forests have

less of a probability of releasing large amounts of harmful GHG emissions into the atmosphere in the form of catastrophic wildfires. Furthermore, as a result of natural absorption, forests reduce the effects of GHG emissions and climate change by removing carbon from the air through the process of carbon sequestration. CSAC also recognizes the benefits of biomass energy as an alternative to the burning of traditional fossil fuels, as well as the benefits of carbon sequestration through the use of wood products.

CSAC supports ETTAC's suggestions for potential forest sector solutions to climate change, including: enhancing carbon storage in forests and in wood products; avoiding carbon emissions from forestland conversion; reducing wildfire emissions that result from unnatural forest conditions; utilizing waste forest biomass to generate electricity or other fuel; substituting low-emission wood products for other building materials that produce high GHG emissions (e.g. concrete, steel). Additionally, CSAC believes that it is imperative that both public and private lands are actively managed in order to ensure the reduction of catastrophic wildfires. To this end, CSAC advocates that adequate funding be provided to support the management of forest land owned and managed by the federal government in California in order to ensure the reduction of catastrophic wildfires.

CSAC appreciates your consideration of these comments and the specific recommendations. We look forward to working with you in the future to address land use, energy and climate change. If you have any questions about our comments or position, please feel free to contact Karen Keene at 916/327-7500 ext. 511 or [kkeene@counties.org](mailto:kkeene@counties.org), or DeAnn Baker at 916-327-7500 ext. 509 or [dbaker@counties.org](mailto:dbaker@counties.org).

Sincerely,



Karen Keene  
CSAC Legislative Representative



DeAnn Baker  
CSAC Legislative Representative