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Mary Nichols, Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95184

Re: Comments on AB 32 Scoping Plan First Update

Dear Ms. Nichols,

On behalf of the League of California Cities (League), I would like to thank the Air Resources Board (ARB) for the opportunity to comment on the AB 32 Scoping Plan First Update (Plan), and specifically thank ARB for acknowledging that close coordination and partnerships at the local level are needed to reach the State's long term climate and environmental goals.

General Comments

California's 482 cities are proud of what they have accomplished to help reduce greenhouse gas (GHG) emissions. Cities across the State have found cost efficient, innovative solutions that accommodate the unique characteristics of their communities. Many have completed GHG inventories, created climate change action plans, and implemented programs that are significantly reducing GHG emissions. These cities are leaders, setting an example for the state, nation, and the world.

The League is pleased that the Plan recognizes the essential role that cities play as "critical partners in meeting the State's GHG goals" and that cities and other local governments "have initiated efforts to reduce GHG emissions beyond those required by the state." As the Institute for Local Government (ILG), the research and education affiliate of the League and the California State Association of Counties has documented, cities have invested significant staff and financial resources to pioneer a wide variety of best practices to reduce greenhouse gas emissions across a broad range of local functions.

Cities and other local agencies are implementing innovative approaches to address climate change through energy efficiency and conservation, water and wastewater systems, green building, waste reduction and recycling, climate-friendly purchasing, renewable energy and low-carbon fuels, efficient transportation, land use and community design, open space protection and offsetting carbon emissions. Cities are also actively participating in rigorous voluntary programs designed to achieve measureable reductions in GHG emissions and energy use, such as the Beacon program administered by ILG through the Statewide Energy Efficiency Collaborative, on behalf of the California Public Utilities Commission.

However, as innovative and successful as these and other local efforts have been, local agencies throughout California lack adequate staff and financial resources to plan, implement, and continue effective programs to reduce GHG emissions, particularly over the timeframe envisioned in the Plan. We believe it is vital that the State establish a local GHG Emission Reduction Program to adequately fund efforts by local, regional, and non-profit organizations to design and implement effective GHG emission reduction programs and best practices in ways that reflect the particular challenges, circumstances, and opportunities in each local community.

Transportation

Transportation is a key emitter of greenhouse gases, but no single strategy in this sector will achieve AB 32 goals. To reach the long-term goals of this Plan, the state will need to implement projects that improve

the efficiency and connectivity of transportation systems. SB 375 has already created the framework from which we can work. As such, we strongly encourage ARB to consider the use of cap and trade revenues for transportation projects and programs that are coordinated with land use policies in order to achieve regional GHG emissions on reduction targets and to meet the state's goals.

Energy Efficiency

The League has long supported energy efficiency and promoted city facilities that maximize energy efficiency and conservation. In fact, in 2009, the League completed a major renovation of its building, which was originally constructed in 1978, to meet the U.S Green Building Council's LEED Gold Standard for new construction. With that in mind, we continue to support the Plan's goal of supporting local government efforts to form property-assessed clean energy financing districts (PACE programs) that allow residential and commercial property owners to finance renewable on-site generation and energy efficiency improvements through voluntary property tax assessments.

With regards to Proposition 39, the League would like to see the Plan place a greater focus on the need to provide funding to local governments for energy efficiency and clean energy projects in all public building, not just public schools.

Water Sector

The League agrees with the Plan that water is a critical component of the State's economy. We also support the State's exiting goal of reducing per capita water use by 20 percent by 2020. In order to help meet this aggressive goal, the League strongly believes that significant state and federal funding is needed to develop and treat alterative water sources such as recycled water and stormwater and urban runoff.

As the Plan looks beyond 2020, it fails to provide recommendations addressing the need to capture and treat stormwater and urban runoff as a way to bolster water supplies and achieve greater energy efficiency. Additionally, the funding recommendations do not identify the size or scope of funding needed to achieve GHG emission reductions while increasing water availability.

Recycling and Waste Management Sector

The League is an active member of the Solid Waste Industry Group - Solid Waste Industry for Climate Solutions, which represents a cross section of local governments and private companies that have financed and built much of the solid waste management and diversion infrastructure in the state. Therefore, please refer to the letter submitted by the Solid Waste Industry Group for our detailed comments on the Plan.

In closing, the League looks forward to continuing to work closely with ARB on creating innovative approaches and programs to assist local governments in their efforts to reduce GHG emissions. Local governments play a critical role in helping the State achieve its climate change goals. However, without adequate funding, significant GHG emission reductions will go unrealized. Therefore, the League strongly encourages ARB to use cap and trade auction revenues to fund local government programs and projects that reduce GHG emissions.

If you have any questions or comments, please feel free to contact me at jrhine@cacities.org or (916) 658-8264.

Sincerely,



Jason Rhine
Legislative Representative