



April 10, 2017

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Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street
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Re: 2017 Climate Change Scoping Plan Update: the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis

Dear Chairman Nichols,

The California State Association of Counties (CSAC) appreciates the opportunity to provide comments on the California Air Resources Board (CARB) 2017 Climate Change Scoping Plan Update (Scoping Plan). CSAC recognizes the importance of assessing our current climate strategies, prioritizing goals that will help us meet our greenhouse gas (GHG) emissions reduction targets, evaluating how to align the state's GHG reduction strategies with other state policy priorities, and providing co-benefits, especially to disadvantaged communities.

State and Local Government Considerations

As noted in the Scoping Plan, counties and other local governments are taking action to reduce GHG emissions through local climate action plans, strategies to reduce energy use and promote renewable energy, land use plans and policies that reduce greenfield development and vehicle miles travelled (VMT), utilizing GHG-reducing techniques to maintain existing infrastructure, and other actions that directly contribute to statewide emissions reduction goals. CSAC supports the Plan's stated aim of helping to advance local efforts, while also recognizing the need to build on, and export this success to other regional and local governments through California and beyond. CSAC believes it is important for the state to recognize that realizing the aggressive goals for voluntary local action proposed in the Updated Scoping Plan will depend upon a robust and sustained effort by hundreds of individual cities, counties and special districts over many years. This sustained effort will require both direct state support and investment in programs at the local and regional level to reduce GHG emissions, and expanded support for effective statewide initiatives such as the Institute for Local Government (ILG) Beacon Program, which is rooted in local government and engages local community leaders, staff and stakeholders on an ongoing basis. ILG, the research and education affiliate of CSAC, the League of California Cities and the California Special Districts Association, works with local agencies and has invested significant staff and financial resources to pioneer a wide variety of best practices to reduce GHG emissions across a broad range of local functions. We believe that supporting this program and others like it will help local governments achieve greater GHG reductions in the long-term.

Waste Management

Counties recognize the potential for GHG emissions reductions from the waste sector and we appreciate the outline of the existing laws and mandates included in the Scoping Plan. Recently chaptered legislation, including SB 1383 (Lara, Chapter No. 395, Statutes of 2016) requires CARB by 2018 to adopt and implement a Short-Lived Climate Pollutant Strategy that will involve a 50 percent reduction in organic waste from our landfills from 2014 levels by 2020 and 75 percent by 2025. This

bill sets ambitious goals for the waste sector. CSAC recognizes and supports the need for a sustainable funding source and the development of additional waste infrastructure. However, we believe that the infrastructure to meet existing state goals and mandates is not expanding quickly enough to accommodate organics diversion targets and remains woefully inadequate. CSAC is committed to partnering with the state on this issue. However, we must stress that before any additional diversion requirements can be achieved from this sector, we must solve our critical funding and infrastructure needs.

Another challenge to building infrastructure is the lengthy timeline required for a composting or Anaerobic Digestion (AD) facility to be operational. "Siting and permitting" is terminology applied to the process by which additional infrastructure is established. For solid waste organics diversion infrastructure, this process is not just the formal process to apply for and issue permits but also includes other aspects which may overlap or be required prior to initiating the permitting process. These aspects include design, feasibility study for the new facility or expanded existing site, the Request for Proposal (RFP) process, establishing financing/rate structures and franchise agreements, identifying or expanding collection and processing/transfer capability, final design, and construction. Most importantly, siting and permitting does not move forward without local community support. To help local governments be successful in achieving our organic diversion goals, significant revisions to existing state requirements for siting and permitting organics processing/recycling facilities are necessary. In addition, there is a need for increases in market support for compost and renewable fuels (subsidies of bio-mass facilities much like wind and solar facilities).

Natural & Working Lands

Counties support the objective in the Natural and Working Lands section that outlines the goal of enhancing the resilience of and potential for carbon sequestration on (those) lands through management and restoration, and reducing GHG and black carbon emissions from wildfire and management activities. As you are aware, the Governor proclaimed a state of emergency in 2015 and articulated the need to protect life and property by mitigating the risk from falling trees and increased fire hazard by removing trees in the vicinity of critical infrastructure. CSAC, along with several of our member counties, is a member of the Governor's Task Force on this issue, and we are intimately aware of the risk posed by the nearly 100 million dead and dying trees throughout California. Continuing to address the tree mortality crisis in California through ongoing state agency coordination, dedicated resources, and state and local collaboration will be critical to mitigating the risk associated with wildfire emissions.

CSAC recognizes the tremendous effort required to update this comprehensive statewide plan to reduce GHG emissions, and we would like to commend CARB for its leadership on this important issue. Thank you for the continued opportunity to play an active role in this process. Should you have any questions or need additional information regarding our comments, please do not hesitate to contact Cara Martinson (916) 327-7500 ext. 504.

Sincerely,



Cara B. Martinson
Legislative Representative

cc: Members, California Air Resources Board