



StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

Member Agencies:

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California Air Resources Board

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Sacramento, California 95814

Subject: Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concepts

Thank you for the opportunity to comment on the draft concepts for the Cap-and-Trade auction proceeds second investment plan. StopWaste is a public agency in Alameda County, a joint powers authority whose members are City and County governments. StopWaste is governed jointly by three Boards: the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council.

We design and implement programs to reduce waste and promote energy efficiency. We have assisted our member agencies with greenhouse gas (GHG) inventories and support their climate action plans through our programs. We have observed their leadership in GHG reduction efforts and support the concept paper's overarching theme of **locally integrated programs**. In addition to infrastructure projects, the integrated approach should apply to programs offered to the public.

Integration promises implementation effectiveness. As the concept paper details, there are currently funded programs in each of the strategies. However, these programs are burdened by limitations and silos that reflect their original purpose and design, and can even have competing objectives. The C&T investments are an opportunity to prioritize and maximize GHG impact across strategies and to start measuring success through a uniform metric of GHG reduction.

Local governments are uniquely appropriate to serve communities with integrated programs. They are a known and trusted channel of information and resources, and their jurisdiction is not limited to any one sector or strategy type. Their services naturally cross the areas of transportation, energy, and natural resource. **Residents and businesses should have one channel** to easily access resources for all GHG reduction opportunities. This leverages limited outreach capacities. Many local governments' climate action programs already contain integrated outreach campaigns to their constituents. Investments should support and build upon these initiatives.

The locally integrated approach should also be applied outside of disadvantaged communities. In addition to funding that should be set aside to serve the disadvantaged communities, the integrated approach should be expanded to other communities. The partnerships and programmatic infrastructure that will be built to implement integrated projects naturally spill over across disadvantaged and other communities. The program partners that would be involved have service areas that are not limited to certain census tracts. This investment should be leveraged to yield the maximum GHG reduction. Additional opportunities may also exist in deploying the integrated approach in communities where residents and businesses have greater access to capital to copay for investments such as electric vehicles and renewable energy.

In addition to directly implementing the integrated approach, local governments also partner with Green Business Programs to deliver integrated services to small businesses. StopWaste has been an official partner agency to the Alameda County Green Business Program (ACGBP) since its inception over 15 years ago and provides on-site assistance to businesses and verifies practice improvements. We participate in the ACGBP because the Program helps businesses adopt best environmental practices with measurable GHG emission reductions and multiple environmental benefits while providing economic benefits and extending program benefits to disadvantaged communities. We support the **inclusion of a small-business element** that would allow programs like the Green Business Program to create a marketplace for Certified Green Businesses and grow the green economy throughout California.

We recommend the addition of the following investment concepts specifically. They may be implicit in the existing concepts. We encourage that they be made explicit as they are distinct enough from the concepts as currently written.

Energy Efficiency and Renewable Energy

- **Fuel switching of space and water heating equipment from natural gas to electric.** The pathways to deep decarbonization rely on electrifying building energy usage. Fuel switching is difficult to justify under existing energy efficiency program regulations.

Protect and Grow Carbon Stocks on Natural and Working Lands

- **Healthy soils practices in urban landscaping.** State-funded lawn conversion presents an opportunity for the state to build healthy urban soils through sheet mulching lawns in place. Sheet mulching is the practice of layering cardboard, compost, and mulch over an existing lawn to smother it. The lawn decomposes in place and, along with the cardboard, compost, and mulch, provides valuable organic matter to the soil. The addition of compost has been shown to significantly increase carbon storage as well as sequestration in soils. This practice directly supports the Healthy Soil goals in the Governor's budget and by putting products made from organic waste to use, supports the state's 75% waste diversion goals as well as mandatory organics recycling requirements of AB 1826.

Reduce Methane Release from Organic Waste

The hierarchy of first, reducing organic waste before managing discarded organics should not be forgotten, and prevention should continue to be a focus.

- **Prevent food waste generation and recover edible surplus food to feed people.** Promoting the practices of food waste prevention and food donation can effectively reduce or eliminate methane emissions.
- **Prevent plant debris generation.** This includes landscaping practices that reduce the excessive growth of plant material that will need to be trimmed, as well as the responsible use of excess material as compost and mulch, which can benefit the healthy soil practices describe above.

We welcome the opportunity to provide more information on our comments and assist staff on any revisions or analysis resulting from our comments.

Sincerely,



Wendy Sommer
Deputy Executive Director