October 28, 2013

RE: Comments of the City of Benicia to California Air Resources Board Regarding AB 32 Scoping Plan Update

Local governments are instrumental to meeting state climate and energy goals. As the closest level of government to Californians, we are able to make a significant impact by taking action in our communities and promoting public awareness. Local leadership enables cities, counties and special districts to work together with a number of partners to initiate projects that target the biggest GHG reduction opportunities, promote energy efficiency and water use efficiency, and create jobs - all of which will spur local economies as well as the state’s economy. Local governments are also an essential part of AB 32 implementation.

The City of Benicia is pleased to provide these comments to the California Air Resources Board (CARB) as it updates the Assembly Bill 32 Scoping Plan. Benicia’s recommendations for the Scoping Plan Update include the following:

1. Support Local Leadership

The Scoping Plan rightly recognizes the critical role of local governments in meeting AB

32 goals noting that: “Local governments are essential partners in achieving California’s goals

to reduce greenhouse gas emissions. They have broad influence and, in some cases, exclusive

authority over activities that contribute to significant direct and indirect greenhouse gas

emissions through their planning and permitting processes, local ordinances, outreach and

education efforts, and municipal operations. Many of the proposed measures to reduce

greenhouse gas emissions rely on local government actions.”

Benicia is currently taking local action to reduce emissions by implementing innovative programs like a comprehensive sustainable business management program (Business Resource Incentives Program) that provides no cost sustainability analyses as well as recommendations for:

* clean energy upgrades
* energy efficiency retrofits
* water conservation
* waste reduction, and
* clean transportation initiatives.

The City then provides funding to businesses in the City’s Industrial Park to implement those upgrades. This is just one of many programs that are currently reducing GHG emissions. The City believes it is essential to provide funds under AB 32 to support these and similar programs.

1. Support Expansion of Regional Collaboration Among Local Governments

The Scoping Plan Update should include an emphasis on expansion of regional

energy programs administered by local governments, which can promote collaboration, efficiency, and cost effectiveness and help municipalities achieve greenhouse gas emissions reductions.

1. Support Expansion of Electric Vehicle Charging Infrastructure

The Scoping Plan should include an emphasis on continued support for electric vehicle charging infrastructure. Increased infrastructure encourages widespread adoption of electric vehicles and can help reduce transportation related emissions locally and statewide. Local governments often have eligible sites for charging stations but cannot cover the costs of equipment and installation.

1. Direct Cap and Trade Revenues toward Local Government Reduction Programs.

Due to the recent economic downturn many local governments’ budgets have been tapped, preventing projects from being funded or completed. We believe a program dedicating funds for local governments to implement greenhouse gas reducing projects will best serve the State in its quest to achieve the goals set forth by AB 32. We agree that funding should be used both for innovative projects that create new systems or technologies and implementation of existing projects proven to reduce or sequester GHG emissions.

The City of Benicia also requests that the Scoping Plan discuss a mechanism to direct a majority of proceeds from covered entities within a local jurisdiction back to the municipality to fund pollution reduction efforts locally. We believe that the addition of a local government-directed return-to-source component will promote statewide sustainability by giving communities most affected by pollution opportunities to implement greenhouse gas reducing and energy efficiency projects that will create jobs and improve the economy, even if they are not designated as a Disadvantaged Community in the Cap and Trade Auction Proceeds Investment Plan.

In closing, local governments continue to be leaders in reducing greenhouse gas emissions and implementing programs that reduce emissions and help California achieve its AB 32 goals. The Scoping Plan Update should recognize the important work of local governments and direct funds back to municipalities to allow them to continue this important work.

Respectfully submitted,

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