



August 5, 2013

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



***Re: The Role of Local Governments in Meeting our 2050 Climate Goals***

Dear Ms. Nichols,

On behalf of the undersigned associations, as well as the many cities, counties and special districts we work with that comprise our local governments coalition, we thank the Air Resources Board for the opportunity to comment on the proposed 2013 Update to AB 32 Scoping Plan, and specifically thank ARB for acknowledging that close coordination and partnerships at the local, regional, state, and national level is needed to reach our long term climate and environmental goals.

The original 2008 scoping plan recognized the essential role that local governments will play in achieving the state's 2020 goals for reducing greenhouse gas (GHG) emissions. Local governments are uniquely positioned to play an important role in contributing to achieving the state's AB 32 goals. The same holds true when looking beyond 2020.

ARB's presentations at the scoping plan update workshops outlined focus areas for a post 2020 strategy that consist of energy, transportation, agriculture, water, waste, and natural and working lands. Local governments have already taken steps to reduce GHG emissions from these sectors, but additional state resources, such as proceeds from allowance sales, are necessary to maximize the ability of local governments to contribute to meeting our 2050 goals. A few such projects/programs that local governments have undertaken to reduce GHGs include:

- The City of San Francisco recently attained an 80% waste diversion rate, and the success of the city's recycling and composting programs means that emissions from waste sent to landfills are down by nearly 50% compared to 1990 levels. Progress can be attributed to local policies including adopting a zero waste goal by 2020 in 2002, a mandatory construction and demolition ordinance in 2006, and a mandatory recycling and composting ordinance in 2009.
- Sacramento Municipal Utility District (SMUD) is currently working with the Regional Water Authority to plan an energy assessment that will identify and optimize efficiency and renewable generation opportunities across multiple independent local water districts. Projects may include accelerated installation of high-efficiency pumps, variable frequency drives and hydro-kinetic devices.
- Sonoma County, Sonoma County Transportation Authority, the Sonoma County Water Agency (SCWA), and all nine cities in Sonoma have adopted a more aggressive goal to reduce GHG emissions by 25 percent below the 1990 level by 2015, and in 2009, legislation enacted the Sonoma County Regional Climate Protection Authority to help the County coordinate regional GHG efforts. SCWA is on track to meet its goal of carbon free water by 2015.

As encouraging as these projects/programs are, many local governments throughout the state lack adequate resources and personnel to plan and implement measures that reduce GHGs. Prioritizing local governments, especially those that are behind the curve in addressing climate change, as a key solution to meeting our climate change goals should be a significant element of the scoping plan update. Continuing to provide tools and resources to local governments to reduce GHG emissions unique to California's local jurisdictions is critical to meeting our 2050 goals.

Local governments have the greatest understanding of what is needed at the local level to reduce GHGs and combat climate change, including, but not limited to, how to mobilize local businesses to capitalize on retrofit programs, increase energy efficiency in existing buildings, reduce vehicle miles traveled through transit-oriented, walkable development and deployment of electric vehicle infrastructure. Accordingly, we encourage ARB to place an even greater priority and emphasis on local governments in its 2013 update to the AB 32 scoping plan. Our coalition of local governments is grateful to be considered a partner with the state on this important policy.

Sincerely,



Cara Martinson  
Associate Legislative Representative  
California State Association of Counties



Kate Meis,  
Associate Director  
Local Government Commission



Jason White  
Legislative Representative  
League of Cities



Christina Lokke  
Legislative Representative  
California Special Districts Association



Grant Davis  
General Manager  
Sonoma County Water Agency