



Local  
Government  
**SUSTAINABLE ENERGY**  
Coalition

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November 1, 2013

Michael Tollstrup  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Subject: Draft AB 32 Scoping Plan Update

Dear Mr. Tollstrup:

The Local Government Sustainable Energy Coalition (“LGSEC”)<sup>1</sup> is pleased to provide these comments to the California Air Resources Board (“ARB”) on the October 1 version of the AB 32 Scoping Plan Update (“Draft Update”). The LGSEC commends the ARB for its leadership in climate protection. The Draft Update demonstrates an understanding of the long-term, complex challenges California faces. It is encouraging to see State agencies joining together to develop strategies for addressing climate change.

The LGSEC is pleased to see the increasing recognition of local government contributions to the achievement of California’s AB 32 goals. Local governments continue to be at the vanguard of sustainability, developing community based programs that draw on the passion of California’s citizens for their communities and for the future. Local and regional governments are critical to the successful implementation of many state measures (e.g., land use, code enforcement). They are at the forefront of designing and implementing innovative programs in multiple sectors. They are leading initiatives to improve quantification methodologies (such as upstream emissions, better transportation quantification). The LGSEC particularly appreciates the recognition in the Draft Update of multi-benefit programs and integrated regional solutions to the challenging environmental, economic, and social justice issues California faces.

### **Specific Remarks**

In reviewing the document we have identified specific revisions that we believe will clarify and improve the report. Text recommended for addition is underlined.

These revisions fall under five categories:

- ✦ Role of Local Governments in Addressing Climate Change
- ✦ Local Governments Are Important in the Water Sector

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<sup>1</sup> Across California, cities, counties, associations and councils of government, special districts, and non-profit organizations that support government entities are members of the LGSEC. Each of these organizations may have different views on elements of these comments, which was approved by the LGSEC’s Board.

- ✦ Local Governments Have a Critical Role in Developing and Implementing Adaptation Strategies
- ✦ Data Must Drive Policy and Action
- ✦ Strengthening the Update's Recommendations

### **A. Role of Local Governments in Addressing Climate Change**

There are several places where the Draft Update should more clearly recognize the important role for local governments in AB 32 implementation, which is broad, touching many key economic sectors.

#### Page 27, Paragraph 3, Energy Efficiency

*“Local governments play several roles to advance energy efficiency in their communities, including developing and running energy efficiency programs, training workforce, community education and outreach, and ordinances for efficiency and disclosure. Local governments in Southern California and the San Francisco Bay Area have formed Regional Energy Networks to implement energy and water efficiency programs for residents. These networks serve more than 21 million people and provide more than \$65 million in program funding in 2013-2014 to reduce statewide greenhouse gas emissions. Effort is underway to develop additional regional energy networks in other regions and to build effective, transformative programs to retrofit the existing building stock.”*

#### Page 53, Second paragraph, Climate Change and Public Health Impacts

*“In the instances in which mitigation measures may be at odds with positive health outcomes, California must ensure that positive health outcomes are maximized as we address climate change. Local governments, through public health departments, are important partners in this work. Local governments also are first responders to natural disasters, which have the potential to become more frequent.”*

#### Page 70, Paragraph 1, Regional Energy Networks

*“The Southern California and San Francisco Bay Regional Energy Networks have been formed to develop and implement regional residential energy efficiency programs beyond those available from local utilities. These programs serve more 21 million Californians and have secured funding of \$65 million in 2013 and 2014 to implement energy efficiency programs.”*

### **B. Local Governments Are Important in the Water Sector**

Local governments are actively engaged in a range of activities related to water quality and water conservation. The Draft Update can better acknowledge this with simple modifications.

#### Page 95, Water

Add after paragraph 4:

*“Many regions of the state can reduce water-related greenhouse gas emissions through improved management of local water resources. Groundwater cleanup, groundwater banking, ground water recharge strategies and measures, potable and non-potable water reuse, stormwater capture and other measures can improve water reliability, reduce*

impact on climate, improve adaptation to climate change, and increase local self-reliance.”

Page 96, Table on Actions for Water Sector, Funding

Suggested revision first point:

- *Increase development of local and regional water sources to increase local self-reliance, reduce dependence on statewide water systems with high embedded energy costs.*

Add the following point:

- “Support the development of self-sustaining financing mechanisms for water efficiency improvements.”

**C. Local Governments Have a Critical Role Developing and Implementing Adaptation Strategies**

The Draft will be strengthened by recognizing the important role of local governments in land use, transportation, public health, and related issues. The Update should provide clear direction about the role of local governments in the period beyond 2020.

Page 43, Forests Sector

- Planning and implementation projects that secure the resilience and vitality of existing forest and urban forest populations against unavoidable impacts of climate change.

Page 58, Looking Toward 2020 and Beyond

Add after last paragraph:

ARB will work with local governments to develop and implement actions that facilitate adaptation. Local governments are critical to protecting real estate, securing water, preventing power outages, developing microgrids that integrate with local renewable resources to reduce power outages, and related activities.

Page 83, Recommendations to Transition Beyond 2020

Add after paragraph 2:

“Local government programs that engage the public and stimulate renovation of existing infrastructure will be an essential component for reaching the 2050 goal. The state will need to recognize the importance of these local and regional programs and ensure that regulatory and funding programs facilitate their development and expansion.”

**D. Data Must Drive Policy and Action**

It is critical that decisions about how to spend resources be informed by data. Many local governments have developed and are implementing climate action plans that are directly responsive to the State’s goals and policy direction. Measuring results, as the Draft Update so astutely recognizes, is very important. Currently, it is challenging for local governments to obtain data on energy usage that can be relied upon for planning and decision making purposes. We therefore recommend the following addition.

Page 60, Second Paragraph, Environmental Justice Communities

“It will be important for local governments and other agencies to have access to data on energy usage data in their communities provided timely, in a consistent format that allows data to be manipulated electronically, and that allows local governments and other agencies to perform the analysis required to implement and evaluate programs and policies.”

**E. Strengthening the Update’s Recommendations**

Below the LGSEC provides several additions that will strengthen the Update.

Page 14, Black Carbon

“California has been an international leader in reducing anthropogenic emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities.”

Page 85 Key Recommended Actions for the Energy Sector

Under “Energy Efficiency, Demand Response, and Combined Heat and Power,” add the following points:

- “Develop market transformation strategies, such as working with the real estate community and promoting labeling that makes energy use and efficiency more transparent.”
- “Pursue energy efficiency through behavior change and addressing plug load.”
- “Research and demonstration projects that establish additional energy efficiency co-benefits and value propositions”

Page 110, Table 16

Under Expansion of established programs, suggested revision fourth bullet:

- weatherization and whole building retrofits

Sincerely,



Jody S. London  
for the LOCAL GOVERNMENT SUSTAINABLE  
ENERGY COALITION