



August 5, 2013

Michael Tollstrup
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814
Submitted via CARB comments webpage:
<http://www.arb.ca.gov/cc/scopingplan/2013comments.htm>

RE: Comments on the California Air Resources Board (ARB) 2013 Update to the AB 32 Scoping Plan

Dear Mr. Tollstrup,

On behalf of the California Association of Local Conservation Corps (CALCC), we thank you for the opportunity to submit the following comments on the 2013 Update of the AB 32 Scoping Plan to the California Air Resources Board (ARB) for consideration.

CALCC is an association of 14 statewide certified Local Conservation Corps that work with young men and women to preserve and protect the environment and provide job skills training and educational opportunities to our corpsmembers. The mission of each certified Local Conservation Corps is to develop young women and men through a program of conservation work, education and community service. The Local Conservation Corps provide an alternative to youth unemployment, incarceration, and substance abuse.

Below are some comments we would like to provide on each of the sectors ARB has highlighted in its presentations at the 2013 Scoping Plan Update public workshops.

Waste

The ARB presentation on waste stated that AB 341 (CHAPTER 476, statutes of 2011), which set a policy goal for the state to reach 75% waste diversion, will be the primary foundation for reducing emissions in the waste sector, and acknowledges the need to move 22 million tons from landfills to meet that goal.

Local Conservation Corps do fee-for-service work for local governments that help them meet their mandatory commercial recycling requirements and move cities' and counties' toward 75% diversion (and ultimately zero-waste). Our corpsmembers collect the hard to reach materials that would otherwise go uncollected and be counted against city and county diversion rates. Therefore, we strongly support the inclusion of AB 341 in the 2013 Scoping Plan Update as an important tool for reducing landfilled waste and increasing reuse, recycling and composting.

As ARB considers strategies for achieving 75% diversion in the 2013 Scoping Plan Update, we agree that the state does not have to wait for the development of sophisticated waste technologies to make advances toward the goal. There are pathways to achieving our goals for waste reduction that can be employed today, such as:

- Prioritizing the collection of materials from under-served communities. This would also benefit disadvantaged communities identified by CalEPA and potentially advance implementation of SB 535 (Chapter 830, Statutes of 2012).
- Prioritizing the collection of recyclable materials to maximize the collection of materials that could be co-collected. This would create additional co-benefits that provide greater impact from the state's investments -- especially by helping the state and its regions to reach a zero-waste future.

With additional support and resources for the next five years, Local Conservation Corps could facilitate these efforts by diverting 85 million tons of recoverable materials (glass, aluminum and plastic) from landfills so that raw materials could be spared.

A specific challenge ARB identified to achieving 75% diversion is how to get consumers and producers to take responsibility for waste. The Local Conservation Corps do educational outreach to school age children, teaching them about reducing waste, recycling and compost. Efforts like this not only help educate individuals about waste management, they educate future generations, which have a positive multiplier effect on how consumers think about their garbage.

Energy

A challenge to realizing all the energy efficiency potential throughout the state is first identifying the total capacity for energy efficiency improvements. This is a challenge that has been recognized through the Energy Commission's implementation of AB 758, the Comprehensive Energy Efficiency Program for Existing Buildings, and more recently with the passage of Proposition 39, which will provide \$500 million for energy efficiency projects at California schools.

Local Conservation Corps are trained to conduct energy efficiency audits to better understand the scope of potential energy efficiency improvements at public facilities, large and small. When the state invests in a corpsmembers to do energy efficiency work, there is the co-benefit of training an at-risk youth with green job skills, building California's future generation of green leaders.

Natural Lands

We strongly support the inclusion of forest management, conservation and fuels management in the 2013 Scoping Plan Update.

Local Conservation Corps perform forestry management services statewide, including fire suppression and fire fuel load reduction. Fire prevention and fuels management help reduce the threat of

catastrophic fires and the potential loss of critical timber stand. The Local Conservation Corps forestry programs provide cost-effective forestry management while helping to reduce GHG emissions, and maintain and enhance the capacity of natural and working lands to sequester and store carbon.

In addition to traditional forestry, we are pleased to see the inclusion of urban forestry in the ARB's presentation. Urban forests have the potential to sequester carbon and filter air pollution. Urban forestry also has the co-benefit of helping communities adapt to the impacts of climate change.

According to the 2009 California Climate Adaptation Strategy, urban forestry "has a significant role in adaptation to rising temperature and precipitation runoff events. Increased street tree cover provides shade relief to pedestrians and other residents, absorbs pollutants including ozone and CO2 which may increase with climate change, and reduces stormwater pollution and flooding."

Trees in urban settings can help reduce local temperatures by 1 to 2 degrees and mitigate urban heat islands. Expanding urban forests by planting trees, planting ground cover, and increasing shading by community gardens, parks, as well as open spaces, can reduce emissions, provide adaptation benefits, and improve the quality of life for city dwellers. These types of projects can also provide a direct benefit to disadvantaged communities – yet another example of furtherance of the goals of SB 535.

Local Conservation Corps perform urban forestry services statewide while providing young adults with academic instruction, employment, green job training, and life skills. With support, corpsmembers have the ability to plant and maintain 100,000 new trees statewide.

Transportation

Transportation accounts for the lion's share of the state's total GHG emissions. Reducing our emissions from transportation is imperative to reaching our long term climate goals.

ARB acknowledges the need for development and infrastructure supporting active transportation as a method for reducing emissions. Local Conservation Corps do high quality projects that are designed to mitigate detrimental environmental impacts related to the construction or modification of transportation facilities by preserving critical habitat and wildlife corridors, sustaining working landscapes, supporting urban forestry and creating local parks in some of our state's most disadvantaged communities.

We support the ARB's inclusion of active transportation and acknowledgment of the need for sustainable communities with range of mobility choices.

In closing, we would like to thank the ARB for its thoughtful approach to the 2013 Scoping Plan Update and for its efforts to consider the state's long-term goals extending to 2050. As ARB reviews all the public comments and develops the draft Scoping Plan Update, we encourage you to be mindful and possibly prioritize those projects that can maximize co-benefits, such as adaptation, assistance to disadvantaged communities, and employment of at-risk youth and the investment in California's future environmental leaders.

Thank you,

A handwritten signature in cursive script that reads "Marilee Eckert".

Marilee Eckert, President
California Association of Local Conservation Corps