



# City of Santa Barbara

Office of the Mayor

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December 9, 2008

Mary Nichols  
Chair, California Air Resources Board  
P.O. Box 2815  
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Marty Blum

**Mayor**

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SUBJECT: CITY OF SANTA BARBARA COMMENTS ON CALIFORNIA AIR RESOURCES BOARD'S PROPOSED SCOPING PLAN

Dear Ms. Nichols:

Thank you for the opportunity to provide feedback on the California Air Resources Board's (CARB) Climate Change Proposed Scoping Plan.

The Proposed Scoping Plan is an enormous accomplishment for the CARB and is a great starting point for establishing the mechanisms necessary to significantly reduce greenhouse gas emissions.

The City of Santa Barbara is committed to reducing emissions from City operations, reducing emissions throughout our community, and helping to achieve the ambitious targets of AB 32. The City has already accomplished several recommended actions to reduce greenhouse gas emissions.

The City of Santa Barbara's Council Sustainability Committee, comprised of myself and City Councilmembers Helene Schneider and Das Williams, has reviewed the information and we are providing some general comments as they relate to the local government targets.

## Regional Transportation-Related Greenhouse Gas Targets

Santa Barbara is currently updating our General Plan, which will incorporate strategies to reduce emissions in our community. We understand that the Regional Transportation-Related target of 5 MMTCO<sub>2</sub>E is a place holder and that the actual target will be established through the SB 375 process. It is unclear what the impact of SB 375 target will be on our General Plan update and the timeline to incorporate any additional strategies. We would like communities which are currently updating their General Plans to be eligible for additional funding to incorporate the new strategies/targets when finalized.

## Local Government Protocol

Santa Barbara has been a leader by completing emissions inventories for two years and we are in the process of certifying our third year. We want to make sure that recalculation of this data will not be necessary and consistency is maintained as the protocol evolves.

## Recycling and Waste

We request an amendment to the Proposed Scoping Plan that would include High Recycling/ Zero Waste (RW-3) as part of the total reductions counted towards the 2020 target. We believe that omitting or delaying the emission reductions possible in this area would be a significant oversight. It will also be important to work with the California Integrated Waste Management Board to eliminate diversion credits for the use of organic material as alternative daily cover (ADC).

### Water

As an agency that provides both water and wastewater treatment to our residents, we want to make sure that three additional areas are covered in the Water section of the Proposed Scoping Plan. There needs to be a distinction between biogenic and anthropogenic emissions so that carbon emissions from waste stream operations are not incorrectly targeted for cap and trade regulatory programs. CARB must also maintain careful oversight of programs developed by other state agencies, such as the State Water Resources Control Board (SWRCB) to assure overall goals and tradeoffs. Also, it is essential that any projects or actions taken be exempt from CEQA analyses for the greenhouse gas aspects of the project.

### Funding

During these economically challenging times, local agencies will require additional funds for projects to achieve the proposed emission reductions. State funding that is generated and designated for greenhouse gas emission reduction efforts should be clearly marked and protected.

In summary, we recommend the following actions:

- Provide funding for communities already updating their General Plan
- Accept current local governments greenhouse gas inventories and maintain consistency as the protocol evolves
- Include a High Recycling/Zero Waste component in the 2020 target and eliminate the use of organic material as ADC
- Define biogenic and anthropogenic emissions
- Maintain careful oversight over agencies, i.e. SWRCB
- CEQA exemption for project or actions taken in accordance with the Proposed Scoping Plan
- Provide funding to communities for emission reduction projects
- Protect State funds for greenhouse gas emission projects

Again, we appreciate the enormous effort CARB has put into creating the Proposed Scoping Plan. We believe with a few additional adjustments to the document, the State will be able to move forward with its plan to reduce emissions.

Thank you again for giving us the opportunity to provide feedback on this important document and effort.

Sincerely,



Marty Blum  
Mayor

Cc: Santa Barbara City Councilmembers  
James L. Armstrong, City Administrator  
Nina Johnson, Assistant to City Administrator  
Marcelo Lopez, Administrative Services Director  
Paul Casey, Community Development Director  
Christine Andersen, Public Works Director  
Robert Samario, Assistant Finance Director