

August 1, 2008

Mary Nichols  
Chair, California Air Resources Board  
Sacramento, CA 95814

**RE: City of Sacramento Comments on Climate Change Draft Scoping Plan**

Dear Chair Nichols:

On behalf of the City of Sacramento thank you for the opportunity to comment on the California Air Resources Board's (ARB) Draft Scoping Plan (Draft Plan). We are excited that the State is taking a leadership role in climate change and hope to provide input that is helpful to the process. Below are the City's major comments on the Draft Plan. Please feel free to contact Yvette Rincon at 916-808-5827 if you have any questions.

General Comments

The City of Sacramento has the following general comments:

1. Additional time to review the Draft Plan would have/will have a positive impact on the quality and completeness of the final document. With additional time the City could more comprehensively solicit input from all appropriate staff members and commented on all aspects of the Draft Plan that we believe will impact the City.
2. Retaining local control over land use is a significant concern to the City of Sacramento.
3. Any final regulations should take in to account the significant costs of implementing a climate action plan. Over the past several years, the City of Sacramento has taken the initiative to register its greenhouse gas emission inventory with the California Climate Registry and bears the burden of funding the administrative costs for tracking and reporting our municipal greenhouse gas emissions. The cost for developing and implementing a climate action plan will be significant.
4. We strongly encourage ARB to adopt an incentive based model for cities to develop regional GHG reduction targets as opposed to a model of mandates and/or regulations.
5. Finally, cities across the State are different and have unique challenges and opportunities, therefore, we would strongly oppose a one size fits all approach to reducing greenhouse gas emissions.

In addition to the general comments above, the City of Sacramento has specific comments in four areas.

## Comments Regarding Local Government Actions and Regional Targets

1. *Voluntary vs. Mandated Approach.* It is unclear what ARB's long term intent is in terms of mandatory vs. voluntary measures. In one paragraph ARB encourages local and regional governments to develop targets to reduce greenhouse gas (GHG) emissions while in another paragraph ARB states that it will track and account for the local government actions to reduce GHG emissions. Will cities be required to track and report GHG emissions and later be required to meet specific State mandated GHG reductions? ARB should be clear about its intent for regulations and requirements for cities in the short and long-term.
2. *Use of Incentives.* ARB should employ an incentives based approach for cities to reduce greenhouse gas emissions. Providing funding to cities to develop regional targets would provide great incentive for cities to do so. Similar to Proposition 1C in which the State rewarded smart growth projects, ARB should grant funding to cities who develop GHG reduction targets and have a climate change plan to reach their GHG reduction targets.
3. The City generally supports tax credits, grants, and loans and other incentives to assist cities, businesses, and local agencies that invest in energy efficient equipment, technology, and programs. However, any carbon fees that ARB is considering must maximize economic benefits and minimize economic harm. That said, ARB should set aside a portion of the revenue from the carbon fees to incentivize local government by:
  - a. Providing sustainable community grants to local governments
  - b. Funding county-wide and city-wide greenhouse gas inventory efforts and annual reporting
  - c. Granting funds to local jurisdictions based on their efforts to move their community towards sustainable operations
4. *Distinguish between municipal targets and community targets.* In general, we agree with the regional approach taken by ARB to develop regional targets to reduce greenhouse gas emissions, however, we would ask that ARB distinguish between municipal targets and community targets. Recognizing that cities have direct control over municipal facilities and operations and less control over the community use of energy and transit choices.

## Comments Regarding Land Use and Regional Transit

1. *Regional Transit must be a priority at the State level.* We agree with ARB's emphasis of the concept of making the connection between transportation and land use and regional planning such as the blueprint. The City of Sacramento has already embraced these concepts by participating in the SACOG blueprint process and adopting a general plan that is consistent with the Blueprint. ARB should reward cities who have taken these steps. However, ARB must recognize in the

scoping plan that in order for cities to have effective land use plans connected to transportation, the State needs to make regional transit funding a priority. There must be viable transportation alternatives including bus and light rail.

2. *Meaningful guidance is needed from the State regarding use of CEQA as it relates to climate control.* ARB makes several references to utilizing the CEQA process to identify potential impacts and mitigation measures. However, in order for cities to do this the ARB and the OPR need to provide meaningful guidance to local jurisdictions, including: how to set thresholds of significance; what constitutes a de minimis impact; developing a consistent statewide methodology and technological resources that local government can use to quantify not only local baseline emission levels, but also how to quantify mitigation for various types of projects.
3. *Heavy/Medium-Duty Vehicles.* We would be interested in regulations addressing the fuel efficiency and hybridization of heavy and medium-duty trucks that improve fuel efficiency and reduce aerodynamic drag and rolling resistance, provided the regulations are cost effective and are phased in over time.

#### Comments on Water

The City of Sacramento currently has various water conservation programs in place including education of the public and businesses on landscaping and community design of residential and commercial developments to reduce water waste.

1. *Public Goods Charge on Water.* In general, we question the cost-effectiveness of the proposed public goods charge. However, if this is the direction ARB is going, we would strongly support local control over the amount of the charge and local control over how the funds are used. Cities across the State are different and have unique challenges and opportunities, therefore, we would strongly oppose a one size fits all approach to the public goods charge on water.

#### Comments on Waste and Recycling

2. The term “Increase diversion and move disposal to zero” need definition and an implementation plan. Currently, the City is on track for a 64-66 percent diversion rate by 2012.