

LAND USE SERVICES DEPARTMENT

385 North Arrowhead Avenue • San Bernardino, CA 92415-0187
(909) 387-4141 • Fax (909) 387-4288
<http://www.sbcounty.gov/landuseservices>

August 7, 2008

Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Re: Draft AB 32 Scoping Plan

Dear Chairman Nichols,

The County of San Bernardino appreciates the opportunity to provide comments on the California Air Resources Board (ARB) Draft AB 32 Scoping Plan (Scoping Plan). San Bernardino County recognizes the tremendous effort required in developing such a comprehensive statewide plan to reduce greenhouse gas (GHG) emissions, and we would like to commend the ARB for its leadership on this important issue.

Local Government Takes Action

San Bernardino County recognizes the need to reduce GHG emissions. As mentioned in the Scoping Plan, local governments are demonstrating leadership at the local level by addressing climate change. San Bernardino County is providing that leadership by developing a Greenhouse Gas Emissions Reduction Plan and creating innovative programs that tackle GHG emissions reductions within the County.

The County of San Bernardino is working with the Governor's Office of Planning and Research (OPR) to incorporate climate change into CEQA guidelines. Furthermore, the County of San Bernardino is developing Interim GHG Emissions Thresholds based on performance standards to be used during environmental review required by the California Environmental Quality Act (CEQA). The San Bernardino County Interim GHG Emissions CEQA Thresholds provide screening tables that will expedite the review process of small projects. In this way, the County of San Bernardino will reduce GHG emissions from all projects requiring CEQA review and incorporate climate change into the planning process now.

Unfortunately, the County of San Bernardino is faced with competing, and sometimes conflicting, goals mandated by the various state agencies. As an example, requiring an increase in the building envelope efficiency of residential uses and mandating more solar assisted residential units increases costs, which is at odds with the state mandate for the County to provide its share of affordable housing. The County of San Bernardino is struggling to balance these issues in a way that fulfills the County's obligation to provide affordable housing and reduce GHG emissions. To successfully achieve this balance, the County needs a great deal of latitude and flexibility promoting innovative solutions for the greatest GHG emissions reductions at the least cost and highest benefit to the citizens of San Bernardino County.

As counties and cities begin to tackle competing issues, more resources will be necessary to achieve greater GHG emissions reductions in a way that also takes into account the other very necessary goals of the State. The County of San Bernardino applauds the Scoping Plan's recognition that in order for local governments to incorporate climate change into their planning processes, financial resources are needed.



COUNTY OF SAN BERNARDINO
PUBLIC AND SUPPORT
SERVICES GROUP

JULIE RYNERSON ROCK
Director

MARK H. UFFER
County Administrative Officer

NORMAN A. KANOLD
Assistant County Administrator
Public and Support
Services Group

Board of Supervisors
BRAD MITZELFELT First District DENNIS HANSBERGER Third District
PAUL BIANE Second District GARY C. QVITT Fourth District
JOSIE GONZALES Fifth District

Land Use, Transportation and Regional Targets

The County of San Bernardino is in support of the regional approach to reducing GHG emissions from land use and transportation. Specifically, we support the development of voluntary regional GHG emissions reductions targets that are developed cooperatively between the State, regional, and local governments. The County strongly believes that collaboration at all levels of government is the best way to achieve our mutual goal – to reduce GHG emissions statewide.

The County of San Bernardino supports the effort to build upon existing Regional Blueprint Plans as a means to achieve GHG emissions reductions. Most of the County area is rural thereby requiring drastically different transportation planning and GHG emissions reduction strategies than those that are successful in urban settings. We are in strong support of the recommendation to develop a package of programs and resources targeted at rural community assistance. This package is similar to the rural blueprint planning set-aside in the State's Regional Blueprint Planning Program, and is crucial as rural areas face different challenges and often times have fewer resources available.

While the County supports the aforementioned land use, transportation and regional policies and recommendations, we would like to make the following suggestions for your consideration and inclusion in the Final Scoping Plan Document:

- Increase funding for maintenance and preservation programs for the existing transportation network. While we understand the focus on supporting various transportation alternatives as a means for GHG emissions reductions, we also stress the importance of supporting an increase in funding for the preservation of the existing transportation system, especially local streets and roads, as this system serves as the transit right-of-way and is critical to a seamless, efficient, multi-modal transportation system.
- Provide financial incentives for rural sustainability. While the Scoping Plan lends support to incentives for better planning policies and critical resource land protection, it does not recognize that counties must provide a balanced service delivery to all its residents irrespective of location. The County of San Bernardino advocates that any new GHG emissions reductions strategies that focus on city-oriented growth and require conservation of critical resource and agricultural lands within the unincorporated area be designed to include a mechanism to compensate county governments for the loss of property taxes and other fees and taxes so that counties can continue to provide the necessary services to all countywide area residents.

High Speed Rail

The County of San Bernardino supports the High Speed Rail (HSR) system, not only for the benefits to the overall transportation network and the movement of people, but also for the significant environmental benefits, including decreased energy consumption, improved air quality, reduced land consumption, and the fewer overall impacts on sensitive habitat and water resources. The HSR system is a critical piece of any solution crafted to reduce GHGs in California. However, we ask that the HSR be linked to the Metrolink and other mass transit systems so that County residents can utilize HSR.

Energy

The County of San Bernardino recognizes that reducing energy consumption is an important way to reduce GHG emissions and supports green building programs that encourage the use of sustainable building practices, incorporating energy efficiency and conservation technologies into state and local facilities. The County of San

Bernardino supports the State's development of a Green Building Standards Code. However, the County of San Bernardino requests that the ARB balance the need for low income housing with the increased costs associated with implementing Green Building Standards.

We also appreciate the long-term benefits of the Governor's Million Solar Roofs Program, which sets the goal of installing 3,000 megawatts of new, solar-electric systems by 2017 through a ratepayer-financed incentive program. The County of San Bernardino supports establishing incentives that will encourage the development and use of alternative energy sources, such as wind, solar, biomass, hydropower, and geothermal resources. Counties also support promoting the timely development of new infrastructure, such as new electric transmission, needed to facilitate renewable energy development.

Forestry

The County of San Bernardino recognizes the dual role California's forests play in global warming, including the benefits of carbon sequestration and the devastating effects of catastrophic wildfires and their release of GHGs into the atmosphere. The County of San Bernardino supports sustainable forestry practices through the existing regulatory process, and encourages continued reforestation and active forest management on both public and private timberlands. Since much of the forested land within the County is on land managed by the federal government, the County of San Bernardino believes that it is imperative that adequate funding be provided to the U.S. Forest Service to support its management of these forest lands to ensure the reduction of wildfires. Given the impact of fires on GHG's, the Scoping Plan should stress the need for the federal government to take appropriate steps to actively manage forest service lands to reduce the risk of catastrophic fires.

The County of San Bernardino is developing Forestry Protocols and supports efforts to quantify reductions in GHG emissions from forest projects. The County of San Bernardino supports responsible, optimum forest management practices that ensure continued carbon sequestration in the forest, provide wood fiber for biomass-based products and carbon-neutral biomass fuels, protect watersheds and protect the ecological values of the forest in a balanced way.

The County of San Bernardino is also currently working on a GHG Emissions Reduction Plan that includes an Urban Forest Management element. The County believes that planting and sustaining an "urban forest canopy" of particular species of drought tolerant trees within the urban portion of the County beyond "business as usual" landscaping requirements is a viable way to provide additional carbon sequestration, stabilize the overall carbon balance, and provide co-benefits of cooling the urban heat sink. We request that the ARB allow the County of San Bernardino the ability to take carbon reduction credit for verifiable and real carbon sequestration associated with urban forests and the flexibility to plan and implement a long-term sustainable urban forest canopy within the urban portions of the County.

Water

The County of San Bernardino recognizes that climate change has the potential to seriously impact California's water supply. Providing potable water and removing wastewater for residential, commercial and industrial uses, and public facilities within the County generates a tremendous amount of GHG emissions through the use of electricity to power the pumps that move the water. The County of San Bernardino supports water conservation efforts, including reuse of domestic and industrial wastewater, reuse of agriculture water, and groundwater recharge. The County needs financial assistance to invest in infrastructure and provide economic incentives that promote water efficiency.

Recycling/ Waste Management

The County of San Bernardino recognizes that significant GHG reductions can be made from turning waste into resources and increasing waste diversion from landfills. However, we do not agree that the first step should be a higher diversion goal. Instead, other changes that would address existing problems associated with the Integrated

Waste Management Act's (Act) implementation should be fully vetted and in place before mandating a higher diversion goal. Such changes would include eliminating some of the Act's existing restrictions on what counts towards diversion; providing for "real" consumer and manufacturer responsibility; placing more emphasis on program implementation, and dedicating any increase in the state portion of the "tipping fee" to local governments to assist in their efforts to reduce disposal. Additionally, the State's Scoping Plan should provide clear guidance to state and local agencies in order to prevent duplicative, ineffective and costly regulatory efforts to control GHG emissions at solid waste facilities. The practices and technology available to manage solid waste facilities have greatly improved in recent years, such as the landfill gas capture systems which now have collection efficiencies of approximately 90% as compared to prior technology available in the late 1990's that had only 75% average collection efficiencies. The Plan should provide flexible mechanisms for achieving GHG reduction goals based on evolving technologies.

Agriculture

The County of San Bernardino supports State efforts to develop a dairy digester protocol to document GHG emissions reductions from dairy farms. The County of San Bernardino also supports State efforts: to develop guidelines through a public process to improve and identify cost effective strategies for nitrous oxide emissions reductions; to conduct additional research; and to analyze carbon sequestration opportunities within the agriculture sector.

Funding Mechanisms

The County of San Bernardino supports diverse financing strategies to address GHG emissions reductions across all sectors, as long as existing funding levels are maintained with historical shares of current funding ensured for counties (i.e. state and federal gas tax increases, etc.) for the transportation system. With respect to the transportation network, many systems are severely underfunded and dependent upon these revenue streams for critical preservation and safety needs, and as noted above, maintaining all existing transportation modes is critical to addressing climate change.

Finally, the County of San Bernardino would like to emphasize that we are in the process of developing, and initiating countywide climate change-related programs. The County of San Bernardino supports the inclusion of these programs into the larger GHG reduction framework and supports acknowledgement of and credit given for these local efforts. The County of San Bernardino agrees with the ARB in its conservative estimate that approximately two million metric tons of carbon dioxide equivalents will be reduced by local government actions by year 2020. It is however, vitally important that the ARB not overburden local governments and aggressively reduce those sectors which are directly or indirectly under its control such as the vehicle GHG standards, Low Carbon Fuel Standard, the State's Renewable Energy Portfolio Standard, and Green Building Standards. The goal of the County's GHG Reduction Plan is to provide real reductions to meet the 2020 reduction target for local governments.

We would like to reiterate that, in order for local communities to tackle the problem of global warming, financial resources must be made available to local governments. The County of San Bernardino encourages the use of grants, loans, incentives and revenue raising authority to assist local governments with the implementation of climate change response activities and GHG reduction strategies.

Thank you for the continued opportunity to play an active role in this process. Should you have any questions or need additional information regarding our comments, please do not hesitate to contact me at (909) 387-4141, jryneron@lusd.sbcounty.gov.

Sincerely,



JULIE RYNERSON ROCK AICP, Director
Department of Land Use Services
San Bernardino County