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Mary Nichols, Chairman
California Air Resources Board
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Re: Draft AB 32 Scoping Plan

Dear Chairman Nichols,

On behalf of the California State Association of Counties (CSAC), we appreciate the opportunity to provide comments on the Air Resources Board (ARB) Draft AB 32 Scoping Plan (Scoping Plan). CSAC recognizes the tremendous effort required to develop 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

Counties recognize the dramatic impact that climate change will have on our society and the need for immediate action to reduce California's GHG emissions. As mentioned in the Scoping Plan, local governments are demonstrating leadership at the local level by addressing climate change and creating innovative programs that tackle GHG emissions reductions in their respective communities. One-third of California's counties have publically committed to reducing their GHG emissions either through ICLEI: Local Governments for Sustainability, the California Climate Action Registry (CCAR), or through the "Cool Counties" Initiative. These communities are leading the way, developing creative programs for climate protection that best suit the unique characteristics of their communities.

As the organization that represents all 58 of California's counties, CSAC recognizes its role to provide educational forums, informational resources and communication opportunities for counties in relation to climate change. CSAC is working closely with the Institute for Local Government (ILG) on their California Climate Action Network (CCAN) to provide local governments with the information and tools they need to take action against global warming. Additionally, CSAC is a member of ICLEI: Local Governments for Sustainability, a group that is working with ARB and CCAR to develop Local Government Protocols for GHG reporting. Furthermore, CSAC is working with the Governor's Office of Planning and Research (OPR) to incorporate climate change into CEQA guidelines. These efforts are helping to facilitate the spread of information and tools available. However, as more counties begin to tackle this issue more resources will be necessary to achieve greater GHG emissions reductions. CSAC applauds the Scoping Plan's recognition that in order for local governments to incorporate climate change into their planning processes, financial resources are needed.

Land Use, Transportation and Regional Targets

CSAC 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. Partnership, cooperation, and collaboration at all levels

of government is the only way in which we will achieve our mutual goal – to reduce GHG emissions statewide.

CSAC supports the effort to build upon existing Regional Blueprint Plans as a means to achieve GHG emissions reductions. 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. CSAC supports financial and technical assistance to local governments to develop and update modeling capabilities for better land use and resource planning.

In addition to the support for the aforementioned policies and recommendations included in the Scoping Plan, we would like to make the following suggestions for inclusion in the Final Scoping Plan Document:

- Fund at an increased level maintenance and preservation programs for the existing transportation network. While we understand the focus on supporting various transportation alternatives to the vehicle 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 recourse land protection, it does not recognize that counties must remain whole for the important purpose of service delivery. CSAC 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 should 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

CSAC 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 impacts overall on sensitive habitat and water resources. The HSR system is a critical piece of any solution crafted to reduce GHGs in California.

Energy

CSAC 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. CSAC supports the State's development of a Green Building Standards Code.

We also see 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. CSAC 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

CSAC recognizes the dual role California's forests play into global warming, including the benefits of carbon sequestration and the devastating effects of catastrophic wildfires and their release of GHGs into the atmosphere. CSAC supports sustainable forestry practices through the existing regulatory process, and encourages continued reforestation and active forest management on both public and private timberlands. CSAC believes that it is imperative that adequate funding be provided to support the management of forest land owned and managed by the federal government in California in order to ensure the reduction of wildfires. Given the impact of fires on GHG's, the Scoping Plan should also acknowledge that the federal government must take appropriate steps to actively manage forest service lands to reduce the risk of catastrophic fires.

CSAC is working with the ARB in the development of their Forestry Protocols and supports efforts to quantify reductions in GHG emissions from forest projects. CSAC 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, and protect the ecological values of the forest in a balanced way.

Water

CSAC recognizes that climate change has the potential to seriously impact California's water supply. CSAC continues to assert that adequate management of water supply cannot be accomplished without effective administration of both surface and ground water resources within counties, including the effective management of forestlands and watershed basins. CSAC supports water conservation efforts, including reuse of domestic and industrial wastewater, reuse of agriculture water, groundwater recharge, and economic incentives to invest in equipment that promotes efficiency.

Recycling/ Waste Management

CSAC 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 less so on numeric compliance; and, dedicating any increase in the state portion of the "tipping fee" to local governments to assist in their efforts to reduce disposal. CSAC is working with the California Integrated Waste Management Board on several pieces of pending legislation that are related to these initiatives.

Agriculture

CSAC supports State efforts to develop a dairy digester protocol to document GHG emissions reductions from dairy farms. CSAC also supports State efforts to develop

guidelines through a public process to improve and identify cost effective strategies for nitrous oxide emissions reductions and additional research and analysis of carbon sequestration opportunities within agriculture.

Funding Mechanisms

CSAC has existing policy in support of additional funding mechanisms aside from gas taxes for the transportation network such as congestion pricing, mitigation fees, and user-based fees which go hand-in-hand with addressing climate change. CSAC supports a diverse financing strategy to address GHG emissions reductions across all sectors, so 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, CSAC would like to emphasize the fact that many local agencies are in the process of developing, or have already initiated climate change-related programs. CSAC supports the inclusion of these programs into the larger GHG reduction framework and supports acknowledgement and credit given for these local efforts. In order for all communities to tackle the problem of global warming, financial resources must be made available to local governments. CSAC 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 DeAnn Baker at (916) 327-7500 ext. 509 or at dbaker@counties.org, or Karen Keene at (916) 327-7500 ext. 511, or kkeene@counties.org.

Sincerely,



DeAnn Baker
Legislative Representative
California State Association of Counties



Karen Keene
Legislative Representative
California State Association of Counties