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Mary Nichols, Chairman  
California Air Resources Board  
1001 "I" Street  
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**Re: 2030 Target Scoping Plan Update – Discussion Draft**

Dear Chairman Nichols,

On behalf of the California State Association of Counties (CSAC), we appreciate the opportunity to provide comments on the California Air Resources Board (CARB) Discussion Draft of the 2030 Target Scoping Plan Update (Discussion Draft). CSAC recognizes the importance of assessing our current climate strategies, prioritizing goals that will help us meet our greenhouse gas (GHG) emissions reduction targets, evaluating how to align the state's GHG reduction strategies with other state policy priorities, and providing co-benefits, especially to disadvantaged communities. CSAC looks forward to reviewing the full draft of the 2030 Target Scoping Plan Update when it is available in early 2017. In the meantime, we offer the following comments on the Discussion Draft.

### **State and Local Government Considerations**

As noted in the Discussion Draft, counties and other local governments are taking action to reduce GHG emissions through local climate action plans, strategies to reduce energy use and promote renewable energy, land use plans and policies that reduce greenfield development and vehicle miles travelled (VMT), utilizing GHG-reducing techniques to maintain existing infrastructure, and other actions that directly contribute to statewide emissions reduction goals. CSAC supports the Discussion Draft's stated aim of "provid[ing] a supportive framework to advance ... local efforts, while also recognizing the need to build on, and export this success to other regional and local governments through California and beyond." As documented by the Institute for Local Government (ILG) (the research and education affiliate of CSAC), the League of California Cities, and the California Special Districts Association, counties have invested significant staff and financial resources to pioneer a wide variety of best practices to reduce GHG emissions across a broad range of local functions. The capacity building and support provided to cities and counties through ILG's Beacon Program for Climate Action, Energy and Sustainability has been an essential contributor to the success of these local voluntary efforts. However, in order to fully meet our 2030 goals, the Scoping Plan Update and actions taken to implement the plan must provide additional technical assistance, increased funding, and incentives that promote continued progress by local governments.

### **Transportation Sustainability**

*Vehicle miles travelled reduction of 15 percent by 2050.* CSAC looks forward to reviewing the potential measures to achieve this level of VMT reduction when Appendix G is made available in early 2017. In addition to policies promoting land uses with lower VMT, CSAC

notes that the local street and road system serves as the primary right-of-way for active transportation and bus transit. The 2016 Local Streets and Roads Needs Assessment has identified a ten-year \$73 billion shortfall to maintain the local streets and road system in a state of good repair.<sup>1</sup> Additional funding is needed to maintain roads and retrofit them to better support active modes of transportation and transit—improvements which often occur in tandem with routine maintenance or rehabilitation projects. In addition to the state’s Active Transportation Program, which provides competitive grants for such projects, predictable formula funding is necessary to plan and execute these projects on the local street and road system as well as to provide matching funds to complete grant projects primarily funded by state or federal funds.

*Stabilize transportation funding.* CSAC supports statewide action to stabilize transportation funding. In addition to funding capital improvements to state and local transportation systems that can reduce VMT as part of regional plans to meet SB 375 emissions reduction goals, CARB should consider the potential GHG benefits of stabilized funding for routine maintenance. An analysis by the National Center for Sustainable Transportation shows that keeping pavements smooth on higher-traffic roads can produce significant reductions in GHG emissions, while on lower-traffic roads, most of the GHG emissions occur in the materials and construction phases and at the end-of-life phase if there is removal and transport of materials.<sup>2</sup> CARB should consider the extent to which well-maintained pavement can reduce GHG emissions, both from vehicles travelling on the roadways as well as by providing adequate funding for routine maintenance that can extend the life of roads that would otherwise require costlier and more energy-intensive rehabilitation or reconstruction.

*Streamline CEQA compliance for infill development.* CSAC supports CEQA streamlining to expedite infill development. In addition to further streamlining measures, parity should be provided under infill streamlining provisions of existing law for projects occurring in urbanized areas, whether incorporated or unincorporated.

*Complete the pilot road charge program pursuant to SB 1077.* California’s excise taxes on motor vehicle fuels have long-served as an effective user fee to maintain and preserve the transportation system. As hybrid and zero-emissions vehicles (ZEVs) have proliferated, however, the amount of tax revenue generated has become increasingly disconnected from the use of transportation system by motorists—a situation that will certainly be exacerbated as California promotes the proliferation of ZEVs in order to meet its emissions reduction goals. In recognition of GHG emissions reductions related to well-maintained roadways, a road charge replacement for the gas tax should be devoted to maintaining the existing local and state road and highway systems and improving local streets and roads to better accommodate transit and active transportation.

*Support and assist local governments in developing and implementing plans consistent with “Vibrant Communities and Landscapes” goals.* CSAC supports incentives, funding and technical assistance to enhance the ability of counties to update local land use and transportation plans, as well as their development codes to better contribute to meeting the state’s GHG emission reduction goals. While many jurisdictions have updated their planning documents, data from recent years shows that general plan land use and circulation

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<sup>1</sup> “2016 Local Streets and Roads Needs Assessment.” <http://www.savecaliforniastreet.org/read-the-report/>.

<sup>2</sup> “The Role of Life Cycle Assessment in Reducing Greenhouse Gas Emissions from Road Construction and Maintenance.” National Center for Sustainable Transportation. [https://ncst.ucdavis.edu/wp-content/uploads/2014/08/07-06-2015-NCST\\_Reducing-GHG-in-Road-Construction-FINAL.pdf](https://ncst.ucdavis.edu/wp-content/uploads/2014/08/07-06-2015-NCST_Reducing-GHG-in-Road-Construction-FINAL.pdf).

elements in many jurisdictions have not been updated for many years, and accordingly may not be well harmonized with the state's 2030 Target Scoping Plan Goals.<sup>3</sup>

In addition to funding for local planning efforts and reinvesting in our existing transportation network, the state must also invest in a permanent source for affordable housing in order to meet our GHG emission reductions goals. The availability and affordability of housing in California is at crisis levels. Counties, and our city and regional partners, need a strong commitment from the state in order to promote housing development affordable at all income levels. Housing in close proximity to a multitude of transportation options, good paying job opportunities, and schools and other services is a vital piece of our climate change puzzle. CSAC is committed to seeking opportunities to incentivize development at the local level by reducing regulatory barriers and uncertainty in the development decision-making process but such development, especially if it is to promote equity and provide for housing affordable to all income levels, will also require significant and sustained financial resources from the state.

## **Waste Management**

Counties recognize the potential for GHG emissions reductions from the waste sector and we appreciate the section of the Discussion Draft outlining "Known Commitments" from the waste sector. Recently chaptered legislation, including SB 1383 (Lara, Chapter No. 395, Statutes of 2016) requires CARB by 2018 to adopt and implement a Short-Lived Climate Pollutant Strategy that will involve a 50 percent reduction in organic waste from our landfills from 2014 levels by 2020 and 75 percent by 2025. This bill sets ambitious goals for the waste sector. CSAC appreciates the Discussion Draft's supporting action bullets that outline the establishment of a sustainable funding source and the development of additional waste infrastructure as critical components of our mutual success in achieving these targets. The infrastructure to meet state goals and mandates is not expanding to accommodate organics diversion targets and remains woefully inadequate. CSAC is committed to partnering with the state on this issue. However, we must stress that before any additional diversion requirements can be achieved from this sector, we must solve our critical funding and infrastructure needs.

Another challenge to building infrastructure is the lengthy timeline required for a composting or Anaerobic Digestion (AD) facility to be operational. "Siting and permitting" is terminology applied to the process by which additional infrastructure is established. For solid waste organics diversion infrastructure, this process is not just the formal process to apply for and issue permits but also includes other aspects which may overlap or be required prior to initiating the permitting process. These aspects include design, feasibility study for the new facility or expanded existing site, the Request for Proposal (RFP) process, establishing financing/rate structures and franchise agreements, identifying or expanding collection and processing/transfer capability, final design, and construction. Most importantly, siting and permitting does not move forward without local community support. To help local governments be successful in achieving our organic diversion goals, significant revisions to existing state requirements for siting and permitting organics processing/recycling facilities are necessary. In addition, there is a need for increases in market support for compost and renewable fuels (subsidies of bio-mass facilities much like wind and solar facilities).

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<sup>3</sup> "2013-2014 Annual Planning Survey Results." Governor's Office of Planning and Research. [https://www.opr.ca.gov/docs/2013-14\\_APS\\_final.pdf](https://www.opr.ca.gov/docs/2013-14_APS_final.pdf).

## Natural & Working Lands

Counties support the objective in the Natural and Working Lands section of the Discussion Draft that outlines the goal of enhancing the “resilience of and potential for carbon sequestration on (those) lands through management and restoration, and reducing GHG and black carbon emissions from wildfire and management activities.” As you are aware, the Governor proclaimed a state of emergency in 2015 and articulated the need to protect life and property by mitigating the risk from falling trees and increased fire hazard by removing trees in the vicinity of critical infrastructure. CSAC, along with several of our member counties, is a member of the Governor’s Task Force on this issue, and we are intimately aware of the risk posed by the nearly 100 million dead and dying trees throughout California. Continuing to address the tree mortality crisis in California through ongoing state agency coordination, dedicated resources, and state and local collaboration will be critical to mitigating the risk associated with wildfire emissions.

CSAC recognizes the tremendous effort required to update this comprehensive statewide plan to reduce GHG emissions, and we would like to commend CARB for its leadership on this important issue. 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 Cara Martinson (916) 327-7500 ext. 504, or [cmartinson@counties.org](mailto:cmartinson@counties.org), or Kiana Valentine at (916) 327-7500 ext. 566, or [kvalentine@counties.org](mailto:kvalentine@counties.org).

Sincerely,



Cara B. Martinson  
Legislative Representative



Kiana L. Valentine  
Legislative Representative

cc: Members, California Air Resources Board