The following comments are based on 12/14/09 draft of EAAC report.

Page 44, Financing Agencies to Ensure That They Can Fully Implement AB 32: This section correctly and reasonably states that local governments can assist in meeting AB32 through:

1. Improved land use planning that complies with SB375
2. Meeting (not exceeding) building code requirements for energy efficiency

Consider including some of the following points in the above section:

1. Under the AB32 Scoping Plan, local governments are asked to voluntarily reduce ghg emissions from their community by 15% by 2020; providing incentives, or simply compensation for work performed, would be incentive to comply with the voluntary request.
2. Local governments can assist in meeting AB32 through these additional mechanisms:
   a. To assist in improving the energy efficiency of existing building stock, residential (and commercial) energy conservation ordinances could be developed, implemented and enforced.
      i. Many cities are developing AB811 processes to assist in improving efficiency of existing construction
   b. To increase the penetration of cost effective, energy efficient new construction (and with CEC assistance in cost effectiveness calculations) local governments could pass ordinances requiring new construction to exceed Title 24 by x%
      i. An SB279 type process may also help increase penetration of energy efficient new construction
   c. Many local governments also operate solid waste operations and strive to meet the State goal of 50% landfill diversion, but reaching for the "brass ring"- e.g. zero waste is not practical or cost effective, given current incentives for reducing waste consist of: (1) rising tipping fees for solid waste and (2) payment for recyclables.
      i. Using performance indicators such as: (1) improved landfill diversion rate and (2) reduced per capita solid waste generation could incent some local governments to strive for zero waste.
   d. Many local governments operate a water utility. The proposed water public goods charge may help government’s meet state goals, but cap and trade incentives may also be reasonable.
   e. Increased public awareness through websites that compare ghg characteristics of local neighborhoods, and other localized public awareness campaigns.

3. Performance indicators were suggested for one example above, but could be developed for each of the above attempts to get local governments more interested in voluntarily meeting State goals.