



May 20, 2008

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The Honorable Jackalyne Pfannenstiel  
Chair, California Energy Commission  
Chair, Climate Action Team's Land Use Subgroup  
1516 Ninth Street, MS-33  
Sacramento, CA 95814-5512

**Re: Draft LUSCAT Submission to Scoping Plan**

Dear Chairwoman Pfannenstiel:

The California State Association of Counties (CSAC) would like to thank the Land Use Subgroup of the Climate Action Team (LUSCAT) for its consideration of our comments and suggested strategies for dealing with greenhouse gas (GHG) emissions from the local government, land use, and transportation sectors during the development of the Draft LUSCAT Submission to the Scoping Plan. Additionally, we appreciate the current opportunity to submit further comments on the Draft Submission.

CSAC is in support of the Draft Submission's 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. In addition we are in support of the following policies and recommendations found throughout the Draft Submission:

- The State recognizes the need for direct investment of State funds, flexibility in the implementation of state-administered programs and tax policy reform to enable local and regional governments to bring about an efficient land use pattern.
- 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, similar to the rural blueprint planning set-aside in the State's Regional Blueprint Planning Program, as rural areas face different challenges and often times have fewer resources available.
- Create incentives for jurisdictions that provide agricultural and natural resource land protection. CSAC finds it essential to ensure that rural, suburban and urban communities have the ability to plan for more strategic growth and still have equitable access to revenues available for infrastructure investment purposes as well as for continued service delivery for future residents that will live within cities but still rely on countywide services.
- Provide financial and technical assistance to local governments to develop and update modeling capabilities for better land use and resource planning.
- Develop, with regional, local, and other stakeholder participation, clear guidance and expectations for regional and local governments in the form of guidelines, methodologies, technical resources, training, etc.
- Provide financial and regulatory assistance, as well as flexibility to implement policies and programs, to local governments to achieve meaningful GHG emissions reductions.
- Coordinate the development of Regional Blueprint Plans, Regional Transportation Plans, Regional Housing Needs Plans, and Local General Plans. CSAC finds it imperative that there be resolution between potentially conflicting GHG emissions reductions targets and other state mandates, most notably the Regional Housing Needs Assessment. Any GHG emissions reduction strategy that promotes more efficient land use patterns must also

accommodate sufficient housing to meet the state's housing needs. Full consideration must be given to the realities facing local governments, such as the need to balance other obligations and also maintain the flexibility to consider additional factors, such as housing choices, private property rights, and infrastructure costs.

In addition to the support for the aforementioned policies and recommendations included in the Draft Submission, we would like to make the following suggestions for inclusion in the final submission to the Scoping Plan:

- 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.
- Also, provide financial incentives for rural sustainability. While the Draft Submission 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.
- Further, as we discuss future funding options (congestion pricing, gas taxes, mitigation fees, etc.) we must consider the current systems that are severely underfunded and dependent upon some of these revenue streams for critical preservation and safety needs.
- CSAC is concerned about the suggested need for legislation regarding waste diversion goals. While we agree that there is a need to address the future direction of the State's diversion program, 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 California Waste Management Act's 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.

Lastly, the final submission should recognize 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.

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 (916) 327-7500 ext. 509 or at [dbaker@counties.org](mailto:dbaker@counties.org).

Sincerely,



DeAnn Baker  
Legislative Representative  
California State Association of Counties