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Via: e-mail to eaac@calepa.ca.gov & goulder@stanford.edu

Larry Goulder
Chairman, Economic and Allocation Advisory Committee
Stanford University
Stanford, California 94305

Dear Chairman Goulder and EAAC Committee Members:

Thank you for all your hard work in creating the draft Allocation Report. We appreciate your inclusion of land use planning and implementation of SB 375 in your investment options. We ask that a portion of the revenue be allocated for specific plans and zoning code updates to help local governments meet the state's targets.

Research shows that sustainable (smart growth) land use plans can reduce vehicle miles traveled and the associated greenhouse gas emissions from 20 to 50%. As a result, the AB 32 Scoping Plan and SB 375 regional targets advisory committee both see local governments as an "essential partner" in achieving reductions in greenhouse gas emissions.

However there is a problem: Even very enlightened developers and builders tell us that local government's zoning ordinances make it impossible to get approval to build sustainable, smart growth development. At a time when improved land use planning is required to implement AB 32 and SB 375, local governments are reducing or eliminating their planning departments due to budget constraints. Without funding they will not be able to undertake the necessary updates of their codes to make them consistent with the state's climate, air quality, and energy conservation goals. It is critical that local governments have funding to update plans and zoning ordinances while growth is at a standstill — it is much more difficult for them to create a vision for future growth while reacting to individual development proposals.

Investing in improved local planning will not only result in reduced GHG emissions, it will also save money. The Sacramento region's smart growth plan is projected to save \$9 billion through the year 2050 — a result of reduced infrastructure and consumer driving costs.

The Local Government Commission encourages the committee to invest cap and trade funds in local planning, explicitly the preparation of specific plans and zoning codes updates. Dedicating a meaningful portion of allowance value to smart growth planning would be a cost-effective investment that will reduce economy-wide GHG mitigation costs. We hope that we can have your support in our efforts to improve our communities, keep money in the local economy, and reach the state's 2020 emissions reduction goal.

Sincerely,

Dan Skoglund
Mayor

cc: Ted A. Gaebler, City Manager
Mike McKeever, SACOG