

CALIFORNIA ENERGY COMMISSION

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Mary Nichols
Chairman
Air Resources Board
1001 I Street, 25th Floor
Sacramento, CA 95814

Dear Chairman Nichols:

The Land Use Subcommittee of the Climate Action Team (LUSCAT) provided a copy of its report, "LUSCAT Submission to CARB Scoping Plan on Local Government, Land Use and Transportation" to CARB on April 4, 2008. This report was made available for stakeholder review on May 5, 2008. A workshop on the report was held on May 14 and comments were accepted until May 21, 2008.

The LUSCAT report was a collaborative effort among a large group of state agencies and, as such, the recommendations represent a wide-ranging approach for how land use measures could be implemented to reduce GHG emissions. The report also identified how individual agencies will support the overall land use strategies proposed in the report.

The LUSCAT recommendations fell into five areas:

1. Regional Land Use and Transportation Targets

LUSCAT recommended that the CARB define emission reduction targets for land use and transportation-related GHGs at both the State and regional levels. Regional planning agencies must work with local governments to map out what is necessary to reach regional targets and then work collaboratively to reach those targets.

2. Guidance on Measurement and Best Practices

LUSCAT recommended that the CARB provide a GHG quantification protocol and guidance for local governments that allows for statewide uniform measurement and estimation of expected jurisdiction-wide GHG emissions. In order to facilitate this, LUSCAT recommended the creation of a stakeholder partnership process to analyze and prioritize the key policies necessary to help regional and local agencies reach the regional targets.

3. State Leadership

LUSCAT recommended that State agencies incorporate GHG considerations into appropriate State program guidelines, standards, and criteria to ensure that state-owned and assisted infrastructure, land use planning, and development are consistent with the State's climate goals.

4. Efficient Land Use Development

The LUSCAT recommended that the OPR and BTH, in coordination with the Strategic Growth Council, convene a multi-stakeholder advisory group to improve land use coordination and goal attainment, and offer recommendations for removal or reduction of the barriers.

5. Measurement of Progress

LUSCAT recommended that the State create and update inventories of GHG emissions. The data will allow regions to track progress towards goals and allow for assessment of the need to revise current, or implement further, measures.

We received comprehensive and detailed comments on the draft report, most of which were supportive of the findings and/or recommendations. The extensive input from stakeholders throughout the process allowed the final report to reflect a wide spectrum of interests. These comments, enclosed hereto, will be a valuable asset to ARB as it moves through the Scoping Plan process. We encourage ARB to review and incorporate them, as appropriate, into the Scoping Plan as it is refined and implemented. We have posted all of the comments received on the LUSCAT website. In addition, we have summarized the stakeholder comments in an enclosed document.

A brief summary of the comments follows:

- **Regional Leadership**
 - Regional Blueprints that are specific to an area (avoid one-size-fits-all) are the best tool to incorporate land use measures and targets/goals.
 - Regional targets are favored over local targets, with flexibility, funding and incentives considered important factors.
- **Reducing Barriers**
 - CEQA should be used to facilitate low-GHG land use development.
 - Efforts are needed to reduce barriers to efficient land use development.
- **State Leadership**
 - Sufficient funding is critical to GHG reductions relating to land use. Diversion of existing funds may not be possible and new funding sources are likely needed. Cap and Trade revenues could be a source of funds.

- Funding of public transit is needed to reduce transportation-related GHGs. Alternate transit modes (walking, bicycling, carpooling) are also key elements.
- Clear guidance, expectations and effective tools are needed by land use players (regional/local government, builders).
- Co-benefits
 - GHG reductions from land use measures should include the many co-benefits resulting from implementation of the measures.
 - Environmental justice must be a key consideration in developing land use strategies under AB 32.
 - Agricultural land should be conserved and sustainable food production encouraged.

We do not plan to further revise the LUSCAT report. Rather, state agencies working both collaboratively and individually can begin implementing the recommendations and strategies, consistent with the CARB's Scoping Plan.

In closing, I offer the continued support of the Energy Commission and LUSCAT to the CARB in the development of land use policies to reduce GHG emissions. Over the coming months the Energy Commission will be preparing our own internal plan to address the energy and climate implications of land use and we look forward to integrating our efforts with those of the CARB and the rest of the Administration's programs.

Sincerely,

A handwritten signature in black ink, reading "Jackalyne Pfannenstiel". The signature is written in a cursive, flowing style.

JACKALYNE PFANNENSTIEL
Chairman

Enclosures