



**CITY/COUNTY ASSOCIATION OF GOVERNMENTS  
OF SAN MATEO COUNTY**

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Comments on the draft 2022 Scoping Plan Update document submitted to the California Air Resources Board (CARB) electronically, on June 24, 2022

Comments:

C/CAG thanks CARB staff and the many contributors to the Draft 2022 Scoping Plan Update document. This is an important update, especially as we approach being a mere 10 to 15 years away from needing to meet some of the most immense targets set by the State and being adopted by many local governments in response. Local efforts are essential to meeting extensive decarbonization goals, some of which will require significant change to our infrastructure, funding mechanisms, and individual ways of life. As captured in the draft document, not only are dealing with mitigation, but also meeting mitigation goals now, is exacerbated by adaptation. Capacity of local government staff to support the “transition”, is at risk.

The following are comments (potential additions to the Scoping Plan) for consideration by CARB staff in support of local government efforts:

1. The State should explore providing community-scale GHG emission inventories to each city in the State. Cities either spend considerable resources to track the results of their GHG emission reduction efforts, or do not track emissions at all. This effort at the state level would provide multiple benefits: freeing up local government staff time to plan and implement programs consistent with the states Equity and VMT/GHG reduction targets, establishment of a California map of emission generation, which could be overlaid with other “layers” such as low-income communities and/or air quality, which would support not only progress but targeting of funding and resources from the State. C/CAG and other statewide partners have approached the CEC, requesting inventories and, though initially supportive of the concept, have recently heard that the CEC may reject this important project.
2. The State provides valuable planning and other resources for local governments, and some funding through grants. However, the largest source of funding (and that which is mainly mentioned in the Scoping Plan, is Cap and Trade. Local Governments share a large responsibility to help meet GHG reduction goals. Some form of regular funding should be provided to local and County governments whose scope of work focuses on the transition to electrification of transportation and buildings for the region they serve. For counties that have no program for their community, this would serve as an incentive to establish an agency.
3. The electrification of transportation and buildings requires an analysis of the reliability of the California, regional or local power grid. The ability to electrify will depend in part on the reliability of the grid and also some form a redundancy or storage for the times when the grid is not operational and/or green energy sources are not available. Consumer confidence is key to implementing a transition that could take 20 years. The State should require transparent local, regional, and statewide power supply planning. That planning should be made public through a Public Grid Reliability Confidence Campaign and should include redundancy planning.

Sincerely,

Sean Charpentier, Executive Director  
C/CAG