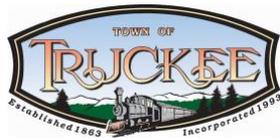
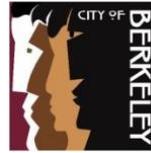
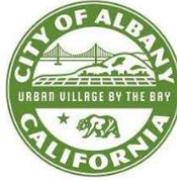
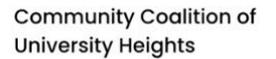


**Local Government Commission**  
*Leaders for Livable Communities*



ALAMEDA COUNTY  
Community Development Agency





October 25, 2021

Rajinder Sahota  
Deputy Executive Officer for Climate Change and Research  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Request for GHG Inventories for California Local Governments**

Dear Rajinder Sahota,

On behalf of 42 cities and towns, 10 counties, 3 councils of government, and 62 stakeholder groups representing coalitions of local governments, nonprofits, community-based organizations, and private sector firms working across California, the Local Government Commission respectfully submits this request for the California Air Resources Board (CARB) to conduct GHG inventories for all cities, counties, and special districts in California.

The IPCC 6th Assessment is a stark reminder that we need to act urgently. Even the leading jurisdictions in California, that have adopted climate action plans and supportive elected officials, struggle to put their plans into action. Part of the impediment is that a disproportionate amount of time and effort is directed toward planning and evaluation, rather than direct implementation and action. Your agency has an opportunity to relieve some local data burdens, which would increase local government capacity for implementation, while simultaneously improving data consistency and utility.

We request that, as a first step, CARB conduct GHG inventories for all cities and counties in California. This statewide initiative would yield the following benefits:

- **Comprehensive coverage across the state.** Acknowledging there are a number of GHG inventories currently in process or recently published, the CARB [CAP-MAP](#) notes that nearly 40% of jurisdictions do not have any GHG inventories on record. Many of the GHG inventories listed are out of date and not likely to represent current practices. A GHG inventory is a precursor to developing climate action plans (CAPs) and ensuring investments in climate action strategies and programs target local pollution sources. This is particularly critical for communities that are disproportionately impacted by poor air quality and with limited resources and capacity to mitigate GHG emissions. Filling the gap for these jurisdictions will enable them to get closer to taking action.
- **Data and methodology consistency.** Currently, cities and counties have different levels of access to quality data and use different methodologies to conduct their GHG inventories. These inconsistencies prevent meaningful cross-jurisdictional comparisons and aggregation for effective regional planning. A centralized effort led by CARB, with the flexibility to go beyond CARB's base methodology, would address this issue and enable local and regional agencies throughout the state to plan, coordinate, and accelerate climate mitigation efforts in a more effective, data-informed manner.
- **Visibility into patterns and progress.** The State, regional agencies, and local governments would gain visibility into the different emissions profiles across the state to identify key policy and programmatic opportunities for rapid and equitable climate mitigation measures. Tracking local

inventories over time would also provide insights into the effectiveness of targeted State investments and local programs to measurably reduce emissions.

To establish an effective statewide GHG inventory program that achieves the above noted benefits, we would like to share the following program design recommendations for CARB's consideration:

- **Engage local governments and stakeholders.** We received numerous comments from local governments across the state that reflect the importance of a technical advisory committee made up of practitioners working on climate action plans to ensure the work would meet the needs of local government and regional agencies in addition to the State. We suggest forming an advisory committee comprised of local officials actively working to conduct GHG inventories that are connected to climate policy development and implementation. The advisory committee would also benefit from the participation of additional industry and subject matter experts.
- **Providing flexibility to go beyond the CARB process.** The GHG inventories developed by CARB should serve as a starting point for local governments to build upon and finalize based on additional local datasets and information. Providing flexibility in how local jurisdictions can utilize State-developed GHG inventories will be critical to enabling cities, counties, and special districts to address their specific needs and tailor their GHG inventory to support climate action. Such flexibility can also help to spur innovations in the practice of climate action planning and help to inform continuous updates to the statewide program that lift up best practices.
- **Continually update CARB's CAP-Map.** The [CAP-Map](#) has served as a valuable tool for local governments and stakeholders to understand the status of climate action planning throughout the state; however, the information included in the current map is out of date. We recommend maintaining the CAP-Map so that it can continue to serve as a valuable resource.
- **Leverage existing tools.** There are several existing platforms and tools that could be leveraged to support a statewide, State-led approach to conducting local GHG inventories, including tools developed by academics (UC Berkeley's [Cool Climate Network](#) and UCLA's [Energy Atlas](#)), nonprofits (ICLEI's [ClearPath](#)), the private sector (Google's [Environmental Insights Explorer](#)), regional public agencies ([Vital Signs](#) in the Bay Area), and other existing platforms. Additionally, the ability of other public and proprietary tools to access the statewide inventory data would also provide important access points to support innovation and efficiency.

Local governments, including cities, counties, and special districts, want to be key partners in meeting the State's ambitious GHG emissions goals. As a recent reflection on [The State of Local Climate Planning](#) suggests, having a state agency take on inventories is an important step in evolving our collective practice. It is a critical part of improving the efficiency and effectiveness of climate action by focusing each level of government's efforts on their unique role, in concert with the other levels of government.

Leading local governments, and some regional agencies on behalf of local governments, have been conducting individual GHG inventories for over a decade, more recently spending nearly \$1 million every year collectively to create or update GHG inventories. In addition to yielding the benefits listed above, centralizing inventories would allow these public dollars to be redirected toward action.

Thank you for your time in considering our request and comments. The Local Government Commission staff who are coordinating this group letter request a follow up meeting to discuss the content of this request and would be pleased to bring together a small cohort of industry leaders to discuss this important issue with appropriate CARB staff. Julia Kim, Climate Change and Energy Program Director

([jkim@lgc.org](mailto:jkim@lgc.org)) and Michael McCormick, Special Advisor ([mmccormick@lgc.org](mailto:mmccormick@lgc.org)) can help set up the follow up conversation and are available to answer any questions.

Respectfully,

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