

[logos]

October 6, 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,

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.** According to your [CAP-MAP](#), 40% of cities do not have any GHG inventories on record. A GHG inventory is a precursor to developing 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 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 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.

Leading local governments have been conducting individual GHG inventories for over a decade, spending hundreds of thousands of dollars collectively. In addition to yielding the benefits listed above, centralizing inventories would allow these public dollars to be redirected toward action.

Local governments 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.

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.

Thank you for your time in considering our request and comments. Please do not hesitate to contact staff at the Local Government Commission who coordinating this group letter if you have any questions or would like to discuss any of our comments further: Julia Kim, Climate Change and Energy Program Director (jkim@lgc.org) and Michael McCormick, Special Advisor (mmccormick@lgc.org).

Respectfully,

[signatures (name, title, org)]

CC:

Richard Corey, Executive Officer, California Air Resources Board
Annalisa Schilla, Chief, Community Action Branch, California Air Resources Board
Samuel Assefa, Director, California Office of Planning and Research
Erik de Kok, Deputy Director, California Office of Planning and Research
Lauren Sanchez, Senior Climate Advisor, Office of California Governor Newsom