

March 15, 2007

Planning Commission
Community Development Department
3015 H Street
Eureka, CA 95503

Re: Group 2, Chapter 17

Dear Commissioners and Staff,

On behalf of Redwood Alliance and our Climate Action Project, we are writing to provide comments and recommendations regarding the Energy Element, Chapter 17 of the Preliminary Hearing Draft. Redwood Alliance is a local nonprofit organization that has been working on energy-related issues in Humboldt County since 1978. We represent the energy and climate-change concerns of over 2,000 Humboldt County members.

We want to commend the planning staff for inclusion of an Energy Element in the Draft, as it is an optional Element for County General Plans. Because aggressive action is required to create energy security and affordability for future generations, and to fulfill our obligation to society help stabilize the climate, we believe it is critical that Plan Alternative A is adopted for the Energy Element of the General Plan Update.

The Intergovernmental Panel on Climate Change, a body composed of hundreds of scientists from over a hundred countries, recently issued preliminary findings of their Fourth Assessment Report. It concludes, with 90 percent certainty, that the accelerated climate warming over the last 50 years is caused by human activity, and that action to reduce greenhouse gas emissions is warranted.

The State of California recognized the need to address global warming when Governor Schwarzenegger signed Executive Order # S-3-05 in June 2005, which set 3 greenhouse gas reduction targets. The State went further in September 2006, when the Governor signed into law AB32, the Global Warming Solutions Act of 2006, which mandates greenhouse gas reductions of 20% below 1990 levels by 2020.

The General Plan shares a responsibility to future generations to create community infrastructures that reduce energy use and rely on clean, locally produced, renewable energy. By creating buildings and infrastructure that save energy, we create financial savings for citizens and governments that can be applied to other vital purposes. By supporting and promoting locally produced energy, we create energy security for ourselves and future generations.

We acknowledge that, while aggressively pursuing these goals requires up-front investments in time and money, the future benefits can be achieved at no net cost and with potential for significant payback. For instance, the Center for Clean Air Policy, in a report issued in January of 2005 concluded that carbon reductions sufficient to meet the Governor's targets can be achieved at no net cost to consumers and likely at a net benefit in both 2010 and 2020. A report delivered to state legislators by the University of California, Berkeley, in August of 2006, reported that returning California greenhouse gas emissions to 1990 levels by 2020, as mandated by AB32, can boost the annual Gross State Product (GSP) by \$60 billion and create 17,000 new jobs by 2020. The Climate Action Team report to Governor Schwarzenegger and the legislature concluded that every dollar spent on energy efficiency in California provides about \$2.00 in benefits.

Specific comments on the Plan Alternatives:

The Plan Alternatives Comparison Chart does not relate to the Goals section in the narrative. It would be easier to understand the comparisons if the Policies, Standards, and Implementation Measures came under headings related to the Goals.

Many of the Policy, Standards, and Implementation Measures as originally defined in the Draft Energy Element, and as submitted by the Redwood Coast Energy Authority (RCEA), are placed in the Comprehensive Action Plan for Energy (CAPE), assumed to be the same as the "Comprehensive Energy Action Plan" on page 17-36. This shifts many of the Policies, Standards, and Implementation Measures back to RCEA. Apparently all funding for RCEA would be the responsibility of RCEA (E-P4) and with many new responsibilities, new funding will become crucial for the increased staff and project funding required.

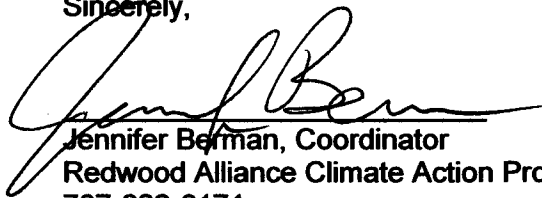
Many of the original Draft Energy Element recommendations are referred to as addressed in other Elements. This may be warranted to remove redundancy in the adopted General Plan Update, but none of these Elements are currently available for review. Many of these are critical to ensuring energy efficiency and security in future planning and development and recognition of this should be retained in the Element. Perhaps the items in the Policy section could be combined in the Goals and/or Policy items, and then referred to other Elements for the Standards and Implementation Measures. For instance, transportation Policies such as E-P11, E-P12, and E-P16-20 could be retained (and possibly combined, as some seem to overlap) under Goal E-G1; a statement could be included that the Standards and Implementation Measures for these Policies, such as E-S4 and E-IM12-16, are addressed in the Circulation Element.

Several of the Alternative A items are addressed by Staff Remarks. Where recommendations for rewording are given, those recommendations should be followed.

Funding for some of these goals will be required. Several of the items relate to developing incentives for the private sector (E-IM36(p), E-IM38, E-IM48) and should be retained, as time spend researching and developing these incentives by County Staff will be rewarded by the encouragement of voluntary implementation of energy efficiency measures in homes and businesses. Permit fee reductions could be part of the strategies as mentioned in E-IM36(p). E-IM29, establishment of a "County facility efficiency" fund, should certainly be retained and could potentially be funded by energy efficiency savings gained from County efficiency implementation, after payback costs are realized.

Thank you for this opportunity for public comment. We look forward to continued participation in the General Plan Update process.

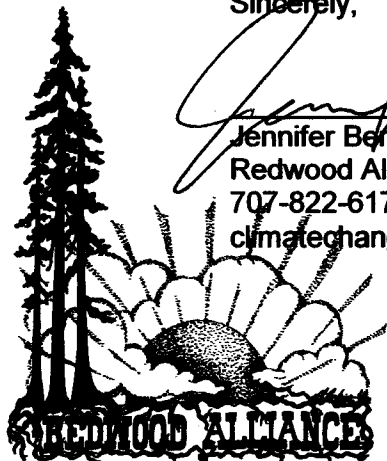
Sincerely,



Jennifer Berman, Coordinator
Redwood Alliance Climate Action Project
707-822-6171
climatechange@redwoodalliance.org



Michael Welch, volunteer
Redwood Alliance
707-822-7884
mwelch@redwoodalliance.org



Redwood Alliance
PO Box 293 Arcata, CA 95518 • 707-822-7884
www.redwoodalliance.org • info@redwoodalliance.org