



Santa Lucia Chapter  
P.O. Box 15755  
San Luis Obispo, CA 93406  
(805) 543-8717  
[www.santalucia.sierraclub.org](http://www.santalucia.sierraclub.org)

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James Caruso, Senior Planner  
Dept. of Planning and Building  
976 Osos Street, Room 200  
San Luis Obispo, CA 93408

[jcaruso@co.slo.ca.us](mailto:jcaruso@co.slo.ca.us)

RE: Public Review Draft, SLO County EnergyWise Plan (Climate Action Plan)

Dear Mr. Caruso,

The Sierra Club applauds the intent and effort behind the draft Climate Action Plan. County Planning is to be commended for building on the creation and updating of a baseline greenhouse gas inventory and putting forward a multitude of implementation measures to reduce regional GHG emissions.

In working toward the achievement of this goal, we feel it would be highly beneficial to the County to include in the Plan a consideration of Community Choice Aggregation (CCA), urged as a primary GHG Reduction Strategy in several CAP planning workshops, previously identified for a feasibility study by the board of SLOCOG, and included in the updated Conservation and Open Space Element of the County's General Plan.

As you know, Community Choice, established by AB 117 in 2002, is a major policy innovation that gives local governments new and important rights to take major roles in achieving the state's most important clean energy and climate protection mandates. It empowers local governments and citizens to address many destructive impacts of the way we generate and use electricity. Only the state's community choice law gives cities and counties the right to purchase electricity from an alternative source from the utility and determine the sources of their electric power.

Community Choice could have a significant impact on the sectors identified in the CAP as the largest local contributors to stationary source GHG emissions and energy use: commercial/ industrial (24%) and residential (15%). Community Choice could also achieve major reductions in community-wide transportation emissions (40%) and emissions from County operations in the sectors of "employee commute" and "vehicle fleet" (66%, combined) via the displacement of gasoline-powered vehicles by increasing the percentage of renewable energy in the local distribution grid and stimulating the growth of residential and commercial rooftop solar systems and their use to charge EV and PHEV vehicles.

In this respect, Community Choice would leverage the implementation of CAP Reduction Measure 21 "Increase the number of hybrid vehicles and use of these vehicles within the County fleet," and 24

“Explore the use of alternative fuels in County vehicles and support the development of alternative fueling stations in the county.” (Regarding Reduction Measure 21, the phrase “hybrid vehicles” should be replaced with “alternative fuel vehicles” to better conform the two measures and to capture this entire sector, not just hybrids.)

Community Choice offers a cornucopia of the GHG Reduction Measure Co-Benefits sought by the CAP (measures that “in addition to reducing GHG emissions...will provide numerous co-benefits to the community while furthering the sustainability goals of the County”), including: Improves Air Quality, Promotes Equity, Improves Public Health, Supports Local Economy, Provides Monetary Savings, Implements State Policy, etc.

The CAP represents the county’s effort to develop policies that enhance the efficiency with which electricity is used in buildings, build renewable power generation and develop programs for clean energy. However, all of these options are — by comparison to Community Choice — of limited scope. All require continued dependency upon electric power from the sources provided by utilities, over which local governments and utility customers have no decision-making authority. A Community Choice program, on the other hand, may include access to state funding for energy efficiency, the ability to set and charge rates, and the ability to manage and redirect the revenue stream from utility bills toward clean energy projects.

For these reasons, no measure in the public review draft of the Climate Action Plan comes close to the GHG and clean energy benefits that could be achieved through Community Choice. No other measure would more fully achieve the goal stated in the Conservation and Open Space Element at Policy E 1.2: “Assert more local control of energy decisions and sources.”

The COSE directs that Policy E 1.2 be effected via Implementation Strategy E1.2.1 – Evaluate Community Choice Aggregation. Specifically, this strategy requires a determination of whether Community Choice would be:

a cost-effective and low-risk strategy to increase use of renewable energy, and realize a low-carbon, local energy portfolio. Evaluate CCA for the ability to develop local energy resources that can feasibly supply heat and electricity to the county; determine the financial framework that provides the lowest cost funding for this portfolio; take actions necessary to provide access to the funding; and create public-private partnerships to construct, operate and maintain the new energy resources as public works projects.

In view of the stated purpose and scope of the Climate Action Plan to build upon the goals and strategies of the Conservation and Open Space Element in order to reduce local GHG emissions, we urge the County to implement this key COSE Policy in the Climate Action Plan.

Thank you for the opportunity to comment on the public review draft and for your attention to this issue.



Andrew Christie  
Chapter Director