



Copies:
ORIGINAL

CO 11/14/08

Board Clerk
Executive Office
Chair

November 19, 2008

Mary Nichols
Chair, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95814

SENT: VIA E-MAIL AND U.S. MAIL

RE: City of Soledad Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the City of Soledad, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan).

We are proud of the work we have done already on reducing our City's greenhouse gas emissions (GHG emissions). The City has purchased low emissions and no emission vehicles; two hybrid vehicles, one hybrid bus, six all electric vehicles. The City has adopted multiple ordinances and plans toward affecting sustainable development; Recycle Water Ordinance, Urban Water Management Plan, Storm Water Ordinance and management plan requiring low impact development and Deconstruction, Demolition and Construction Material Recovery and Diversion from Landfills Ordinance. The City has contracted for and implemented recycle containers for all residences and businesses. The City is building a 5.5MGD Water Recycling Facility to be completed in 2010. The City has commissioned development of a CEQA document for installation of multiple 100KW wind turbines to offset the electric use at the new Water Recycle Facility. The City has commissioned an energy retrofit project for the potable water system.

The major consideration for Soledad and Cities like Soledad is dealing with the cost of achieving the 1990 level emissions when the City has increased in population by 102% since 1990 while the State of California over all has only increased in population by 24% in the same period. There needs to be a sliding scale or different formula or consideration for Cities like Soledad who are making legitimate efforts to achieve the goals of the plan, but face an abnormally large reduction due to rapid growth.

While the City of Soledad is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers take account for the means that will be needed to achieve the goals. AB 32 requires that reductions in GHG emissions must achieve the maximum technologically feasible and cost effective reductions and for the ARB to "consider the cost-effectiveness of these regulations." (HSC §38560) In addition, we believe that the Scoping Plan appropriately allow the SB 375 process to develop regional transportation-related GHG targets. Implementation of the regional planning processes in SB 375 are new and largely untested. The 5 MMT figure, while a place holder, nevertheless sets an appropriate benchmark that helps assure that the state can achieve its overall 2020 goal."

As both the state and local governments are faced with critical budget shortages, additional costs to heavily invest in GHG emission technologies in the next 2 to 3 years will become more burdensome for



local governments. While local governments can influence development design to a certain extent, the reality is that developers will only build projects that will be purchased by willing customers and that are profitable. In order to effect the desired change, incentives must be provided to the development community and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The City of Soledad strongly encourages the ARB to consider these limitations as it moves forward with the Scoping Plan

Thank you again for the opportunity to comment. The City of Soledad looks forward to working with the ARB in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adela P. Gonzalez', with a stylized flourish at the end.

Adela P. Gonzalez, City Manager

C: League of California Cities, 1400 K Street, Sacramento, CA 95864
Cliff Price, Director of Public Works