

# CITY OF AMERICAN CANYON

Planning/Building Department

Gateway to the Napa Valley



VIA E-MAIL/WEB

[http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=scopingpln08&comm\\_period=A](http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=scopingpln08&comm_period=A)

December 1, 2008

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

**SUBJECT: CITY OF AMERICAN CANYON Comments on Air Resources Board  
Proposed Scoping Plan**

Dear Chair Nichols:

On behalf of the City of American Canyon, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan). The League of California Cities has worked diligently with ARB and other stakeholders to address our major issues of concern and to represent us and other local governments throughout the process of developing the Scoping Plan.

The City of American Canyon supports many measures proposed in the Scoping Plan, including energy efficiency programs, a renewables energy mix, green building practices that reduce energy use and demonstrate a return on investment, incentives for reducing transportation-related greenhouse gases, and recycling and waste measures.

We are proud of the work we have done already on reducing our City's greenhouse gas emissions (GHG emissions). This year, we have joined organizations and programs such as ICLEI and ABAG Energy Watch and both the City Council and Planning Commission have met in regular session and study sessions to discuss proactive measures to address climate change. The Planning Commission recommended approval and in February of this year, the City Council adopted a resolution to:

1. take actions in the City's own operations and in the community to be energy and resource efficient, including creating an action plan related to conservation and emissions reductions; and;
2. adopt land-use policies that reduce sprawl, preserve open space, and create compact, walkable communities; and
3. promote transportation options and alternatives such as bicycle and pedestrian trails, commute trip reduction programs, and incentives for carpooling and transit; and
4. help educate the public, business, and industry about energy and resource efficiency, and reducing pollution.

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**LEON GARCIA**  
Mayor

**CINDY COFFEY**  
Vice Mayor

**JOAN BENNETT**  
Councilmember

**DON CALLISON**  
Councilmember

**ED WEST**  
Councilmember

While the City of American Canyon is supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers to account for the means that will be needed to achieve its 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) As both 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. Presently, local governments simply do not have the monetary resources to go beyond current local efforts to reduce greenhouse gas emissions. Please keep in mind that cities throughout California are facing the prospect of laying off or furloughing up to as many as 25% of their employees.

In addition, we believe that the Scoping Plan appropriately allows the SB 375 process to develop regional transportation-related GHG targets. The implementation of SB 375 is intended to work from a bottom up approach, where local governments develop land use policies designed to reduce sprawl and increase use of alternative modes of transportation, and are involved in regional planning efforts. Implementation of the regional planning processes in SB 375 is both new and largely untested. The City of American Canyon is concerned that the ARB may establish higher targets for greenhouse gas emissions reductions as part of the Scoping Plan, when the effort to establish targets will ultimately be determined during the SB 375 process.

Finally, 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 such as transportation and infrastructure funding should be provided to local agencies in order to encourage the types of development that reduce energy use and vehicle miles travelled in areas where the reductions in GHG emissions will be the greatest.

The City of American Canyon strongly encourages the ARB to consider these concerns as it moves forward with the Scoping Plan. Thank you again for the opportunity to comment; we look forward to working with the ARB in the future.

Sincerely,



Leon Garcia  
Mayor

cc: League of California Cities, 1400 K Street, Sacramento, CA 95864