CITY OF SOLANA BEACH
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December 10, 2008

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

Subject: Comments of Air Resources Board Proposed Scoping Plan
City of Solana Beach

Thank you for the opportunity to provide comments on California Air Resources Board's (ARB) Proposed Scoping Plan. We respect the efforts that the ARB has pursued for the continued protection of our environment and the implementation of AB 32. The City of Solana Beach is generally supportive of the goals and objectives of the Scoping Plan to achieve a variety of solutions that will ultimately reduce critical Greenhouse Gas (GHG) Emissions associated with AB 32 and SB 375. To that end, we would like to provide comments that we believe should be addressed in the Scoping Plan for further evaluation as follows:

1. The Scoping Plan framework promotes a variety of tasks to be completed by jurisdictions requiring cities to submit GHG reduction protocol's for municipal and community operations. The development and implementation of these protocols require significant resources in staff time and funding that is financially burdensome to local government, particularly in our current economy. It will be important that adequate financial resources be provided to local government in order to help ensure successful compliance to the very important goals of the plan.

2. The present infrastructure does not support the mandates of the Scoping Plan regarding the relationship between land use and transportation. While the authority to regulate land use is under the jurisdiction of local government, transportation and public transit has a multi-jurisdiction responsibility. The implementation of SB 375, directly relates to the framework of the Scoping Plan, will require MPO's to include a "Sustainable Communities Strategy" (SCS) in their updates to Regional Transportation Plans (RTPs), detailing expected infrastructure improvements. Like other cities, Solana Beach, will be dependent on this multi-jurisdiction coordination and will be a challenged in identify funding resources for this effort. Again it will be important to find statewide solutions in identifying and providing adequate funding resources to provide these very important supportive infrastructure improvements.

We embrace the policies of AB 32 and ask that the ARB work with local government and in particular small local government entities and to acknowledge economies of scale in the efforts to implement AB 32 and SB 375. If you have any questions or comments, feel free to contact me directly at (858) 720-2430.

Sincerely,

David Ott, City Manager

cc: Mayor of Solana Beach
Solana Beach City Councilmembers
Johanna N. Canlas, City Attorney
Wendé Protzman, Deputy City Manager
Tina Christiansen, Director of Community Development
Mo Sammak, Public Works Director/City Engineer
Rich Whipple, Principal Planner