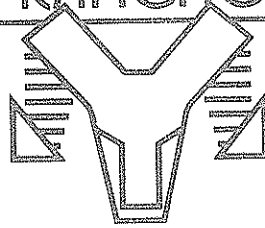


CITY OF RANCHO MIRAGE



CO 12-40

November 26, 2008

ORIGINAL: Board Clerk
Copies: Executive Officer
Chair

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

Re: City of Rancho Mirage Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the City of Rancho Mirage 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). Our City and the Coachella Valley Association of Government has taken the issue very seriously. In fact the City's General Plan Conservation, Circulation and Air Quality Elements guide new development projects through superior design to combat global warming. We have waived fees for solar panel installation, and require new development to be oriented for solar panel installation. The City has a capital improvement program which includes bus shelter installation to encourage alternative transportation to the automobile. Our CEQA checklist requires GHG emissions to be evaluated on projects outside the scope of the General Plan EIR. In one visit to the City's website you will find a list of over 60 individual items of effort undertaken by our community to promote conservation of energy and our natural resources.

While the City of Rancho Mirage 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.

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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 Rancho Mirage 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 Rancho Mirage looks forward to working with the ARB in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick M. Pratt". The signature is fluid and cursive, with a large initial "P" and "M".

Patrick M. Pratt
City Manager

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