

CITY OF LOS ALAMITOS

CO 1242



December 1, 2008

ORIGINAL:

Board Clerk

Copies:

Executive Officer

Chair

Mary Nicols, California Air Resources Board Chair
League of California Cities
1001 I Street
P.O. Box 2815
Sacramento, CA 95814

**SUBJECT: LEAGUE OF CALIFORNIA CITIES COMMENTS ON
AIR RESOURCES BOARD PROPOSED SCOPING
PLAN**

Dear Chair Nicols:

This letter serves as the City of Los Alamitos support for maintaining 5 MMT Regional Transportation-Related GHG Target for the Air Resources Board Proposed Scoping Plan.

Although the Scoping Plan acknowledges that the actual regional transportation-related GHG targets will be set through the regional process developed in SB 375, the City is aware that many are advocating that this number be raised. Given the deference the Scoping Plan gives to the SB 375 process, perhaps such an increase would largely be symbolic. However, since CARB has ultimate responsibility for setting the targets, a higher number would create pressure for setting a higher target, regardless of the findings of the Regional Targets Advisory Committee. There are also a number of additional reasons that setting of a higher target is unnecessary and would not be helpful to the state or local government:

- **Not needed to Achieve the 2020 Goal.** The Scoping Plan lays out a plan to meet the statutory goal in AB 32. Increasing this number goes beyond the clear direction in AB 32.
- **Proportional Reduction From Cars & Light Trucks Already Established.** Cars and light trucks account for approximately 31 percent of all GHG emissions in California. When you account for the reductions from light-duty vehicle standards (31.7 MMT), low carbon fuel standards (15 MMT), vehicle efficiency measures (4.5 MMT) and regional transportation related GHG targets (5 MMT), emissions from cars and light trucks will be proportionately reduced by 33 percent (56.2 out of the total 169 MMT reduction).

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- **Modeling Uncertainties Still Abound.** To be sure, a great deal of data suggests that certain land use patterns correlate with smaller emission reductions. There is little to no experience in modeling these decisions on as broad a scale as will need to be implemented on the current Scoping Plan. The professional and technical expertise should be allowed to develop before making local and regional accountable for targets that will be difficult to quantify.
- **Acknowledging Current Economic Uncertainties.** Increasing the target will put pressure on CARB to adopt higher targets at the regional level. As a result, it will be more difficult to achieve the California Environmental Quality Act (CEQA) streamlining contained in SB 375. As demonstrated by the Governor's proposed budget recommendations, such streamlining can have an important economic effect and help stimulate the economy.
- **SB 375 Targets Can Be Modified.** SB 375 allows CARB to readjust the regional targets every four years if necessary. As a result, these targets can be revisited if circumstances require.
- **Setting the Stage for 2050.** There is a general acknowledgement that reductions from cars and light trucks will need to be proportionately greater to meet the 2050 goal. This is because the changes related to land use will be incremental: if California builds 200,000 new housing units each year, it will take more than 60 years to match the number of current residences (over 13 million). The residences and jobs located within the existing built environment will have the same or similar traffic patterns well past 2020 regardless of the success any new development enjoys in reducing emissions. Although it is going to take time to steer the ship, the Scoping Plan lays a foundation for more substantial gains between 2021 and 2050.
- **Better Model for Other States to Follow.** In supporting SB 375, cities and counties are accepting their responsibility. The best thing that could happen for all is for local governments to achieve, and even greatly exceed, the established targets. AB 32 needs this kind of success rates to show the rest of the country—and the world—that such reductions are possible without a lot of pain. Set this target too high, and CARB risks changing the story; hitting such targets will seem less easy and other states are less likely to follow our lead.

The City of Los Alamitos hereby requests that the California Air Resources Board maintain the 5 MMT Regional Transportation-Related GHG Target for the Air Resources Board Proposed Scoping Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Rudat". The signature is fluid and cursive, with the first name "David" being the most prominent.

David L. Rudat
Interim City Manager

DLR/SM