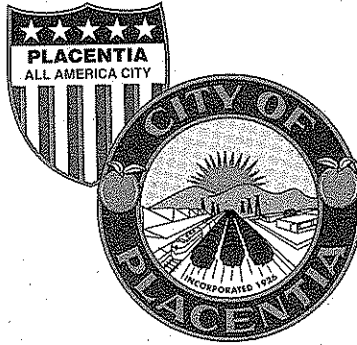


The People are the City

CO 12-21

Mayor
SCOTT W. NELSON

City Administrator
TROY L. BUTZLAFF



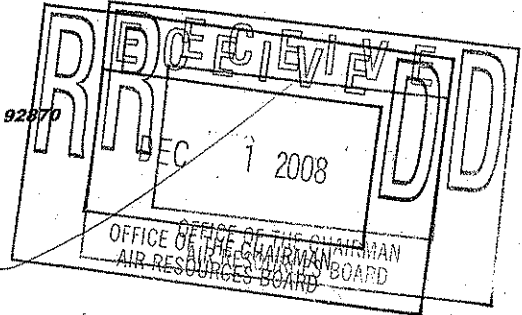
Councilmembers:
JOSEPH V. AGUIRRE
SCOTT P. BRADY
GREG SOWARDS
CONSTANCE UNDERHILL

ORIGINAL
Copies:

Board Clerk
Executive Officer
Chair

401 East Chapman Avenue - Placentia, California 92870

November 19, 2008



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

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

Dear Chairwoman Nichols:

On behalf of the City of Placentia, we appreciate the opportunity to provide comments on the Air Resources Board's (ARB) Draft AB 32 Scoping Plan (Scoping Plan).

While the City generally supports a regional approach to reducing greenhouse gas (GHG) emissions from land use and transportation, we are very concerned about the cumulative and localized impacts that may result from policies that are being considered for inclusion in the scoping plan. These impacts need to be analyzed and taken into account when choosing policies to include in the final scoping plan.

As you know, 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 order to meet the requirements of the law and address our concerns, we ask that you and the ARB staff consider the following:

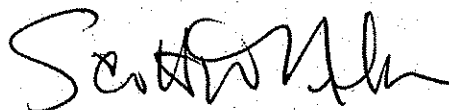
- Conduct cumulative impacts assessments to identify the geographic areas that currently bear a higher pollution burden using best available data and tools, including the Cumulative Impacts Screening Tool currently being developed by a team of university researchers in conjunction with ARB;
- Protect disproportionately impacted communities from any additional pollution burden that could result from AB 32 policies. This may include special requirements for facilities located in burdened areas; and

- Provide incentives 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.

While we hope that you will address our concerns as part of the final scoping plan we would also like to point out that now is not the time to be imposing additional costs on local government. Our City like so many others across the state has been adversely impacted by the downturn in the national economy. The City is currently running a deficit and has been forced to make deep budget cuts including having to layoff a number of full and part-time employees, imposing a hiring freeze and suspending all non-essential purchases. To require us to heavily invest in GHG emission technologies over the next 2 to 3 years will only burden our already strained fiscal position. In light of this, the City respectfully requests that any new mandates be placed on hold until such time as the national economy improves and the fiscal conditions of both the state and local agencies have stabilized to sustain such costs.

Thank you again for the opportunity to offer comments on the scoping plan. We hope that you will consider our comments and concerns over the fiscal health of our community before finalizing the scoping plan.

Sincerely,



Scott W. Nelson
Mayor

TLB/EDT/mp

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