Barry Brucker, Mayor

November 19, 2008

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

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

Dear Chair Nichols:

On behalf of the City of Beverly Hills, we appreciate the opportunity to provide comments on the Air Resources Board (ARB) Draft AB 32 Scoping Plan (Scoping Plan). The City appreciates the remarkable effort required to develop such a comprehensive statewide plan to reduce greenhouse gas (GHG) emissions, and we would like to applaud the ARB for its stewardship on this significant issue.

Local Government Takes Action

Cities recognize the dramatic impact that climate change will have on our society and the need for immediate action to reduce California's GHG emissions. As mentioned in the Scoping Plan, local governments are demonstrating leadership at the local level by addressing climate change and creating innovative programs that tackle GHG emissions reductions in their respective communities. This year we proudly purchased the City's first electric vehicle and plan to expand our fleet with low or zero emission vehicles in the near future. In February 2007, the City became a signatory to the US Conference of Mayors Climate Protection Agreement.

We believe that as more cities begin to tackle this issue more resources will be necessary to achieve greater GHG emissions reductions. We, therefore, applaud the Scoping Plan's recognition that in order for local governments to incorporate climate change into their planning processes, financial resources are needed. Moreover, we are in support of the following policies and recommendations found throughout the Draft submissions:

- Provide financial and technical assistance to local governments to develop and update modeling capabilities for better land use and resource planning.

- Develop, with regional, local, and other stakeholder participation, clear guidance and expectations for regional and local governments in the form of guidelines, methodologies, technical resources, training, etc.
- Provide financial and regulatory assistance, as well as flexibility to implement policies and programs, to local governments to achieve meaningful GHG emissions reductions.

Land Use, Transportation and Regional Targets

The City is in support of the regional approach to reducing GHG emissions from land use and transportation. Specifically, we support the development of voluntary regional GHG emissions reductions targets that are developed cooperatively between the State, regional, and local governments. Partnership, cooperation, and collaboration at all levels of government is vital in order to achieve this mutual goal. Passenger vehicles and light duty truck emissions account for approximately 40% of total GHG produced in the state. We therefore augur that California's waiver request from the EPA under the Clean Air Act will soon be granted in order to implement vehicle emissions standards under AB 1493.

Water

California's water system is the single largest user of energy in the state, accounting for about 20% of gross electricity use and more than 30% of natural gas use. An aggressive water-use efficiency program would enable California to save approximately 5 million acre-feet by 2020—enough to meet the water supply needs of every household in Los Angeles County. We would like to stress that effective management of water supplies cannot be accomplished without efficient administration of both surface and ground water resources within the state, including the efficient management of watershed basins. We are in support of water conservation efforts, including reuse of domestic and industrial wastewater, reuse of agriculture water, groundwater recharge, and economic incentives to invest in equipment that promotes efficiency.

As a signatory to the California Urban Water Conservation Council, the City is committed to adopting water-wise practices while aggressively promoting conservation. Testament to this commitment, in June of this year, we adopted a voluntary water conservation ordinance. Furthermore, we supported AB 2175 and will continue to do in the future.

Thank you again for the opportunity to comment. The City of Beverly Hills looks forward to partnering with the ARB and other local and regional entities as we work towards this formidable goal.

Sincerely,

Barry Brucker
Mayor

cc: Beverly Hills City Council
Teresa Acosta, League of California Cities