



City of Commerce

Community Development Department

Bob Zarrilli
Director

November 19, 2008

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

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

Dear Chairperson Nichols:

On behalf of the City of Commerce, 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). The City is actively looking at ways to reduce greenhouse gas emissions by being a leader and setting an example for our residents and businesses. The City has a wide variety of comprehensive policies and programs that proactively address greenhouse gas emissions from both stationary and mobile sources. Examples of these include the following:

- A comprehensive general plan that includes a transportation element which contains a number of policy recommendations and strategies to improve air quality within the city and the region as a whole that will improve vehicular circulation and the movement of goods and freight thereby decreasing air quality impacts from mobile sources.
- A zoning code and development standards that encourage excellence in design and site layout for new projects that improve on- and off-site vehicular layout and access.
- A commitment to the principles of environmental justice through our General Plan and other policy documents to make sure every project or program is reviewed within the larger framework of environmental justice and attempts to lessen the air quality impact to our local residents.

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- Redevelopment activities to encourage the recycling of land and the redevelopment of older obsolete buildings with state-of-the-art facilities which are fully code compliant. As an added benefit, these new projects utilize fixtures, equipment and technologies that combine to increase both operational and energy efficiency and thereby reduce greenhouse gas emissions.
- Being an active partner with several local, regional, and state agencies for the various long-range transportation projects that will improve the movement of goods and freight in the region, including but not limited to the proposed I-710 Freeway Improvement Project, I-5 Freeway Project, and Washington Boulevard improvement project, etc.
- Whenever CEQA review is required for public or private projects, the City requires the analysis of the greenhouse gas impacts with a constant commitment to requiring state-of-the-art mitigations (when necessary) to improve or lessen the impact to air quality and greenhouse gases.
- Our City Council has a stated goal of developing policies to encourage green buildings. In fact, Commerce is proud to have collaborated with the County and Federal Agencies to assist in the construction of the Contessa Foods facility in Commerce. This facility has recently been recognized as the first LEED certified state-of-the-art frozen foods packaging and processing facility in the world.
- The City's Transportation Department is taking the lead in converting various city vehicles to utilize alternative fuels having recently purchased a fleet of buses that will operate on Compressed Natural Gas (CNG). In addition, the City is currently facilitating the construction of a CNG/LNG fueling facility here that will service our local fleets as well as other local and regional transportation fleets.
- On behalf of our local residents, our City Council constantly advocates for the implementation of mitigations through ARB to the Union Pacific and Burlington Northern Rail yard facilities in this community emphasizing new technologies that will profoundly increase the air quality in the area including new locomotive technology, alternative fuels, etc.

The City of Commerce is doing a lot at its level; however, much remains to be done. We are convinced that the best approach is one where government (at all levels) works cooperatively to lead by example providing real incentives to encourage the private sector to make business decisions taking into account more environmentally friendly means and methods.

While the City of Commerce is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers to 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 is 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.

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 Commerce 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 Commerce looks forward to working with the ARB in the future.

Sincerely,



Bob Zarilli
Director of Community Development

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