



CITY OF COSTA MESA

CALIFORNIA 92628-1200

P.O. BOX 1200

FROM THE OFFICE OF THE MAYOR

VIA E-MAIL/WEB:

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=scopingpln08&comm_period=A

November 18, 2008

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

SUBJECT: City of Costa Mesa Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the City of Costa Mesa, 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). In 2007, the Costa Mesa City Council took a proactive stance in addressing many municipal service and operation areas pertaining to economical and sustainable practices, activities and procedures. Through the adoption of Council Policy 500-14 (attached), the City identified seven main areas, specific objectives within those areas, and action deadlines. The City also adopted a "Build It Green" program that waives building permit fees for qualifying "green" improvements.

Costa Mesa is one of many cities working towards an environmentally sustainable future, now and in the future. However, with regard to the Scoping Plan, it is imperative that all programs be balanced by the current economic crisis that is affecting both the State and local governments.

While the City of Costa Mesa is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for State policymakers to take into account the means that will be needed to achieve those 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 allows 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 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 Costa Mesa 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 Costa Mesa looks forward to working with the ARB in the future.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric R. Bever".

Eric R. Bever
Mayor

/ccp:cg

Attachment: Costa Mesa City Council Policy 500-14 (Sustainable Municipal Green Policy)

c: League of California Cities – Attn Kyra Ross – FAX: (916) 658-8240
League of California Cities, OC Division – Attn Tony Cardenas – FAX: (714) 972-1816