

City of Alhambra

Office of the Mayor and City Council

December 8, 2008

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

RE: City of Alhambra's Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the City of Alhambra, 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 to reduce our City's greenhouse gas emissions (GHG emissions). The City of Alhambra has, for many years, been working on converting much of its fleet to CNG and has installed its own CNG station which is shared, through a contractual arrangement, with neighboring agencies. The City has also undertaken many projects to retrofit its facilities to make them more energy efficient. Working with Chevron Energy Solutions, the City retrofitted its lighting and HVAC in the City Hall and Police Facility to save on energy costs as well as to improve the environment inside and outside of these facilities. The anticipated saving on the lighting retrofit alone is anticipated to be \$179,988 in the first year.

The City of Alhambra is supportive of the State of California's efforts to improve the environment for its residents and businesses and reduce GHG emissions and the negative impact of those emissions on the state and ultimately the planet, however, of greatest concern is the process and requirements that may be imposed upon cities to achieve these reductions. The Proposed Scoping Plan discusses voluntary efforts, partnering with State Agencies to create and implement programs to meet the goals in the Scoping Plan and the effort to change consumer thinking. The concern the City has with these broad, voluntary statements is the cost of implementing the programs created by the partnering agencies.

The Proposed Scoping Plan briefly discusses the estimated cost of implementing the Plan and the collection of fees to fund its implementation. It estimates the cost to be approximately \$55 million per year, with additional revenues needed to repay the loans to pay for startup costs. In today's economic times and with the State of California's looming economic crisis, it is hard to imagine where the Air Resources Board and its partner agencies will find the funds to cover the budget without making these programs mandatory.

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



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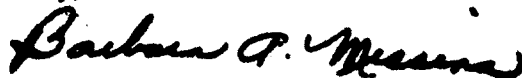
(HSC §38560) In addition, we believe that the Scoping Plan appropriately allows the SB 375 process to develop regional transportation-related GHG targets. Implementation of the regional planning processes in SB 375 are new and largely untested. The 5 MMT figure, while a place holder, nevertheless sets an appropriate benchmark that helps assure that the state can achieve its overall 2020 goal.”

The City of Alhambra is a built out community, it does not have the mass transportation hubs to build around nor does it have vacant land to develop in a green manner. The implication of the areas intended to address the reduction of GHG emissions - recycling, clean energy, transportation and green building - has potential cost associated that could be detrimental to cities if a funding mechanism is not in place to assist local governments with their costs. New developments require infrastructure improvements that are very costly. New requirements on the delivery of water through the use of clean energy or the reduction in waste to zero waste systems will require improvements to the current system which will need to be passed on to the consumer if a method for funding is not included in the creation of these new emission reduction programs.

As both state and local governments face critical budget shortages, additional costs to heavily invest in GHG emission technologies in the next 2 to 3 years will be 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 Alhambra 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 Alhambra looks forward to working with the ARB in the future.

Sincerely,



Barbara Messina
Mayor

Cc: City Council
Julio Fuentes, City Manager
League of California Cities