



City of La Habra

"A Caring Community"

ADMINISTRATION BUILDING

201 E. La Habra Boulevard

P.O. Box 337

La Habra, CA 90633-0337

Office: (562) 905-9700

Fax: (562) 905-9719

November 19, 2008

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

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

Dear Chair Nichols:

On behalf of the City of La Habra 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). La Habra has adopted a resolution authorizing implementation of a voluntary Sustainable Development Program for new construction projects. The program includes incentives such as Priority Plan Check service, Guaranteed Plan Check Timelines, Priority field inspection service, Overtime Inspections and Release of Electrical Meters prior to final inspection to encourage builders to participate.

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

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 La Habra 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 La Habra looks forward to working with the ARB in the future.

Sincerely,

Don Hannah
City Manager

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