

# The City of Bellflower

*Families. Businesses. Futures.*

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November 21, 2008

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

ORIGINAL  
Copies:

Board Clerk  
Executive Officer  
Chair

## Re: Comments on California Air Resources Board AB 32 Scoping Plan

Dear Chair Nichols:

The City of Bellflower appreciates the opportunity to comment on the Scoping Plan being proposed by the California Air Resources Board (ARB) as required by AB 32. We generally support the intent and purpose of AB 32 and the proposed Scoping Plan, which include policies and programs to reduce greenhouse gas emissions to 1990 levels by the year 2020. In recent years, the City of Bellflower has done its part to reduce greenhouse gas emissions by complying with energy-efficiency and conservation requirements and green building standards. The City will continue to require development compliance of these requirements and standards in the following years.

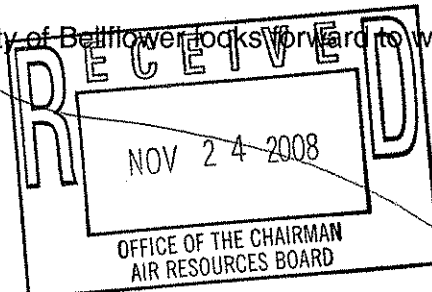
We do, however, have concerns as to how these policies and programs could be feasibly achieved and implemented. There must be balance between achieving these policies to reduce greenhouse emissions and the costs to be incurred by the City of Bellflower and other cities in California. For example, the Scoping Plan acknowledges that in order to achieve its emission-reducing goals, new energy-efficient infrastructure must be constructed. The question is who pays for this new infrastructure? While cities can regulate development and design, the reality is that developers will only build projects that are marketable and profitable. If these developers are required to also construct new, high-cost energy-efficient infrastructure, their respective projects could become infeasible. Cities cannot be expected to finance the infrastructure construction, especially during these difficult economic times.

We agree that reduction in greenhouse emission levels is necessary, but the Scoping Plan must provide funding sources, incentives, and practical solutions to help cities raise the necessary money to construct new infrastructure, if developers are unable to do so, and for achieving its emission-reducing goals and objectives. If the Scoping Plan ultimately results as a deterrent to future development, cities in California would suffer and would not be able to participate in its implementation.

Thank you again for the opportunity to comment. The City of Bellflower looks forward to working with the ARB in the future.

Sincerely,

  
Michael J. Egan  
City Manager



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

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