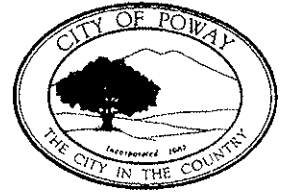


CITY OF POWAY

MICKEY CAFAGNA, Mayor
BOB EMERY, Deputy Mayor
MERRILEE BOYACK, Councilmember
DON HIGGINSON, Councilmember
BETTY REXFORD, Councilmember



December 2, 2008

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

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

Dear Chair Nichols:

On behalf of the City of Poway, 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. Through an ongoing partnership with the Center for Sustainability, we have audited most all City facilities and operations to ascertain changes that can be made to not only reduce our carbon footprint, but to do so in a cost effective manner. During these times of ever-constricting budgets, it is important to implement changes that can be made without negatively impacting other programs and services. The measures we are implementing will save the City an estimated 175,000 kilowatts of energy and reduce greenhouse gases by approximately 143,000 lbs per year. Residents of Poway have also voluntarily reduced their consumption of water by 10% (second best in region) and our solid waste diversion rate stands at 63%. The City of Poway Redevelopment Agency also has the distinction of having helped finance the construction of the first apartment complex in the United States to be fully powered by solar energy. These goals have been reached by carefully selecting those measures that work economically and by discarding those that would pose unreasonable burdens upon the City of Poway and its residents.

While the City of Poway 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 the goals. AB 32 requires that reductions in GHG emissions must be technologically feasible and cost effective (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 over the next few 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 to local agencies in order to encourage more development and redevelopment in areas where the reductions in GHG emissions will be the greatest. The City of Poway 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 Poway looks forward to working with the ARB to build a more sustainable future for California.

Sincerely,



Mickey Cafagna
Mayor

CC: Poway City Council
League of California Cities