

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

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August 11, 2008

Mary D. Nichols, Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Nichols:

On behalf of the Southern California Association of Governments, I am pleased to submit these preliminary comments on Climate Change Draft Scoping Plan. The Draft Scoping Plan begins to describe the tremendous challenge that has been given to your board under AB 32.

SCAG, as you know, is a Metropolitan Planning Organization (MPO) charged with preparing transportation, air quality, and other plans under various State and Federal laws. We are also a member organization comprised of 167 member cities and six counties in the Southern California region. We have been a partner with your agency in planning for clean air for nearly four decades.

We are encouraged that the Draft Scoping Plan recognizes the potential for regional planning and collaboration to achieve air emissions benefits. Of note, the Draft Scoping Plan proposes two million metric tons of CO₂ equivalent reductions to be achieved by local agencies through regional blueprint planning processes in 2020.

We recognize, however, that while the Draft Scoping Plan and Appendices lay out broad parameters under which regional targets for greenhouse gas (GHG) emissions reductions might work, there are many significant issues that would need to be fully addressed in order for our members to move this measure forward. Major examples include the appropriate level of the local government GHG reduction target (and any potential associated vehicle miles traveled reduction target), the technical methods to establish and verify emissions reductions, accountability measures, and commitment to incentives and funding for local participation.

Please note that a one-size-fit all approach may not be appropriate, and urge you to work with SCAG to further consider the breadth and complexity of the Southern California region, and to coordinate with us in your outreach to the variety of stakeholders here.

ARB staff has been accessible to SCAG staff, and I appreciate the willingness of your staff to work with us on discussing these issues. Nevertheless, I strongly encourage you to have additional focused discussions with MPOs around the State and with representatives of local governments.

Finally, please be aware that while we are submitting preliminary comments to respond to the August 11 deadline, we have not to date convened a full policy review and discussion involving SCAG's Regional Council. To that end, a Climate Change Workshop has been scheduled for September 4, 2008, the next meeting date of the SCAG Regional Council. It is our intention to submit further comments to you after the Workshop, but in advance of anticipated adoption of the Scoping Plan in November.

I am pleased that ARB will participate in the Climate Change Workshop discussion with the Regional Council when it meets on September 4. The Workshop will provide an opportunity for direct discussions with representatives of SCAG member cities and counties.

Thank you again for the opportunity to comment on the Draft Scoping Plan. We look forward to working with you on this important effort.

Should you have any questions regarding this letter, please contact Mr. Hasan Ikhata, Executive Director, at (213) 236-1944 for further information.

Sincerely,

A handwritten signature in black ink that reads "Richard T. Dixon". The signature is written in a cursive style with a large initial 'R' and a long horizontal stroke at the end.

RICHARD T. DIXON
President
Southern California Association of Governments