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CITY OF EUREKA

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CITY MANAGER

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November 25, 2008

ORIGINAL:
Copies:

Board Clerk
Executive Officer
Chair

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

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

Dear Chair Nichols:

On behalf of the City of Eureka, thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan per AB 32. We are proud of the work we have done already on reducing our City's greenhouse gas emissions (GHG), and we are currently preparing to invest in additional efforts.

Among some of the actions we have taken to date include upgrading our fleet of vehicles with hybrid cars, remodeling City Hall to incorporate new energy efficient heating systems, using methane produced at our wastewater treatment plant to fuel power systems, and performing an inventory of our GHG levels within city limits from all sectors including transportation, industrial, residential, commercial, and waste. We are also in process of designing and installing solar heating systems for many of our public buildings and facilities.

While the City of Eureka is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial that state policymakers take into account the means 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."


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. Presently, local governments simply do not have the monetary resources to go beyond current local efforts to reduce greenhouse gas emissions. Please keep in mind that cities throughout California are facing the prospect of laying off or furloughing up to as many as 25% of their employees.

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 Eureka strongly encourages the ARB to consider these limitations as it moves forward with the Scoping Plan. Further, we also encourage the Board to allow the SB 375 process to develop regional transportation-related GHG targets. We believe it would be premature and unnecessary to now establish higher amounts of greenhouse gas emission reductions, when the effort to establish targets will ultimately be determined during the SB 375 process.

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

Sincerely,



David W. Tyson
City Manager

Cc: Mayor and City Council
League of California Cities, 1400 K Street, Sacramento, CA 95864