City of Tulare
Agri-Center Of The World

City Council

November 18, 2008

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

VIA EMAIL

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

Dear Chair Nichols:

On behalf of the City of Tulare, 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). The city has used natural gas as a vehicle fuel for its refuse, transit and light vehicle fleets for over ten years. The city recently opened the third E85 ethanol station in the state, and the first in the San Joaquin Valley. Nearly 60 of our light vehicles are now running on E85. The city has recently completed an energy retrofit project to replace air conditioning, install double pane windows, install reflective roof coating and replace street lights with low wattage fluorescent fixtures. The largest fuel cell installation (900 kW) running on biogas has been operating at our wastewater treatment plant for over a year, which complements a 30 kW solar photovoltaic carport at the plant. The city has plans to install additional fuel cell capacity as biogas generation increases.

While the City of Tulare is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers to 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 Tulare 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 Tulare looks forward to working with the ARB in the future.

Sincerely,

Craig Vejvoda
Mayor

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