



December 2, 2008

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

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

Dear Chair Nichols:

On behalf of the City of Taft, thank you for the opportunity to comment on the California Air Resources Board's (CARB) proposed Scoping Plan.

We are proud of the work we have done already on reducing our City's greenhouse gas (GHG) emissions. In August 2008, the City enrolled all of its accounts into the Pacific Gas and Electric (PG&E) ClimateSmart Program. The ClimateSmart Program is a new voluntary option from PG&E that enables local governments and community residents and businesses to take action against climate change by reducing the GHG emissions associated with their energy use. Funds generated by the ClimateSmart Program will be invested in new California-based GHG emissions reduction programs.

The City is making an effort to make the public aware of the things they can do to reduce GHG emissions and recycle. The City published an article in the local newspapers entitled "10 things you can do to combat Global Warming". The article informed the public of the everyday things they can do to reduce greenhouse gases and improve air quality. Also, the City put together a detailed list of all the recycling centers in the area and published it in the local newspapers.

The City also worked with PG&E to make its facilities energy efficient in order to conserve energy and reduce costs. The City will further encourage and implement programs to do its part in reducing GHG emissions and improving the air quality in the Southern San Joaquin Valley Air Basin.

While the City of Taft is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial State policymakers take account for the means that will be needed to achieve the goals of reducing GHG. California Health & Safety Code (HSC) §38560 requires California Air Resources Board (CARB) to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. HSC §38562 (b)(5) states that CARB shall consider the cost-effectiveness of these regulations.

In addition, the City is supportive of the model proposed in the Scoping Plan that recognizes that regional transportation related to GHG targets will be set by the process outlined in Senate Bill (SB) 375. Although, CARB should retain the 5 million metric tons (MMT) figure for regional transportation-related GHG targets in the Scoping Plan and let the regional target process set out in SB 375 operate as it was intended. The City will work with its regional transportation agency to comply with SB 375.

As State and local governments deal with critical budget shortages and deficits, additional costs to invest in the reduction of GHG emission technologies in the next 2 to 3 years may become more of a financial burden for local governments. Local governments can influence and change development design standards, but the reality is that developers will only develop projects that will be appealing to customers in order to stay in business. 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 Taft strongly encourages that CARB consider these limitations as it moves forward with the Scoping Plan.

Thank you again for the opportunity to comment on the Scoping Plan.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dave Noerr", with a large, sweeping flourish extending to the right.

Dave Noerr
Mayor

c: League of California Cities, 1400 K Street, Ste. 400, Sacramento, CA 95814
Robert T. Gorson, Jr., Taft City Manager
Ronald E. Brummett, Executive Director, 1401 19th Street, Suite 300, Bakersfield, CA 93301
Taft City Council Members