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C I T Y O F S E L M A

1710 TUCKER STREET • SELMA, CALIFORNIA 93662

November 17, 2008

Ms. Mary Nichols
Chairperson, California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814

ORIGINAL: Board Clerk
Copies: Executive Officer
Chair

Re: **City of Selma comments on Air Resources Board Proposed Scoping Plan**

Dear Ms. Nichols:

On behalf of the City of Selma, thank you for the opportunity to comment on the California Air Resources Board's Proposed Scoping Plan. We are currently working on reducing our City's greenhouse gas emissions (GHG) and we have established an employee "Green" committee.

While the City of Selma 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 resources that will be needed to achieve the goals of AB-32. This law requires reductions in GHG emissions to 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 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 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 Selma 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 Selma looks forward to working with the ARB in the future.

Sincerely,

Dennis Lujan
Mayor Pro Tem

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