

1011-103  
City Manager  
559/591-5904

City Attorney  
559/437-1770

Administrative Services  
559/591-5900

Development Services  
559/591-5906

Dinuba Vocational Center  
559/596-2170

Fire/Ambulance Services  
559/591-5931

Parks & Community Services  
559/591-5940

Police Services  
559/591-5914

Public Works Services  
559/591-5924

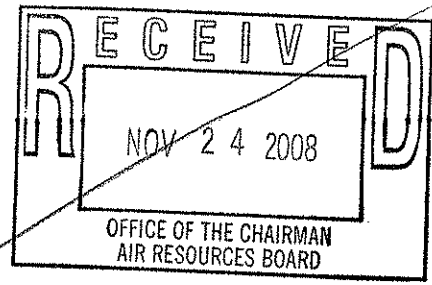
*Celebrating 100 years of Service 1906 • 2006*

November 20, 2008

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

ORIGINAL:  
Copies:

Boa J Clerk  
Executive Officer  
Chair



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

Dear Chair Nichols:

On behalf of the City of Dinuba, 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). To date the City has:

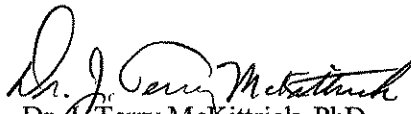
- Constructed and operates a CNG fueling station;
- Acquired and operates four CNG transit buses;
- Acquired and operates eight CNG light service and utility trucks;
- Acquired and operates four hybrid vehicles;
- Acquired and operates four electric vehicles;
- Worked cooperatively with Dinuba Unified School District, Tulare County and Peña's Disposal (the City's contract waste hauler) to acquire and operate CNG buses and trucks;
- Installed LED lighting in place of fluorescent and incandescent lighting;
- Implemented standards to encourage energy efficient residential development;
- Encouraged (with incentives) infill development where possible; and
- Developed and implemented standards for compact residential development.

While the City of Dinuba is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers 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 is new and largely untested. The 5 MMT figure, while a placeholder, 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 Dinuba 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 Dinuba looks forward to working with the ARB in the future.

Sincerely,

  
Dr. Terry McKittrick, PhD  
Mayor, City of Dinuba

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