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CITY OF FORT BRAGG

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December 10, 2008

Mary Nichols, Chair December 10, 2008 California Air Resources Board 1001 I Street P.O. Box 2815 Sacramento, CA 95814

## Re: City of Fort Bragg Comments on ARB Proposed Scoping Plan

Dear Chair Nichols:

The City of Fort Bragg is taking aggressive steps to reduce carbon emissions and we appreciate the State of California's leadership in the global effort to curtail greenhouse gas emissions (GHG). We believe substantial government resources should be directed to help implement improvements by governments, private businesses and California residents.

Our small city, set on the rural Mendocino coast, has compiled a comprehensive inventory of government and community GHG emissions and we have adopted aggressive emissions reduction targets equal to the targets set by the City of Santa Monica. We have stepped up efforts to retrofit City buildings with energy efficient lighting and heating equipment, invested millions to install sidewalks and bike lanes, and largely eliminated our sphere of influence to concentrate development in our existing City limits. We also have a committee working on a potential, low-carbon power plant which would use biomass as fuel.

Implementation of GHG reduction measures requires more than commitment; it requires financial resources. We are concerned that many small businesses that operate heavy diesel equipment will not have the financial resources to implement the policies contemplated by the Air Resources Board. Many of these of these small businesses operate in communities like ours throughout rural California, and they operate their equipment seasonally, due to weather, regulations, and road conditions. Large companies which transport freight on California's highways have the ability to operate year-round. These highway haulers put 130,000 to 180,000 miles on their trucks each year. If seasonal equipment operators are going to be expected to replace equipment before its useful life has expired, then the Air Resources Board needs to provide funding to fill the gap for these businesses, many of which are small businesses. We have also heard concerns that the diesel technology should be fully proven, and we ask that the Air Resources Board evaluate this technology and communicate that information to the public.

Thank you for this opportunity to comment.

Best regards,

Fort Bragg City Council