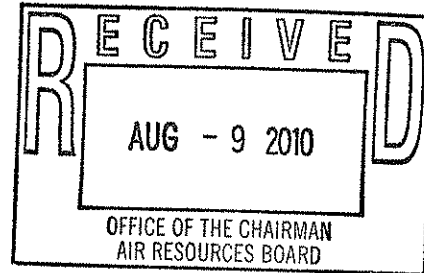




August 4, 2010

Mary Nichols, Chair
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812



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Peter Herzog

Mayor Pro Tem
Richard Dixon

Council Members
Kathryn McCullough
Marcia Rudolph
Mark Tettemer

City Manager
Robert C. Dunek

Dear Ms. Nichols:

Subject: Draft SB 375 Greenhouse Gas Targets for the SCAG Region

Thank you for the opportunity to review and comment on the proposed draft greenhouse gas emission reduction targets that have been released for the 18 Metropolitan Planning Organizations in the State, pursuant to SB 375 requirements, to reduce greenhouse gas emissions from passenger vehicles and light trucks in Year 2020 and Year 2035.

The City of Lake Forest has been monitoring SB 375 planning efforts through the Orange County Council of Governments (OCCOG). OCCOG is one of two subregions that has elected to prepare a subregional Sustainable Communities Strategy that will be developed and integrated into the regional Sustainable Communities Strategy developed by the Southern California Association of Governments (SCAG).

While the City of Lake Forest may not have the resources to be visible and attend your public meetings on GHG target-setting, this letter summarizes the City's recommendations and comments on the draft GHG target-setting process.

Our recommendations and comments on GHG target-setting are as follows:

1. Allow Flexibility in the Setting of Final GHG Targets:

Target-setting needs to be flexible and respectful of the diversity of each MPO region and the diversity of each jurisdiction within each MPO region. Reducing GHG emissions cannot be accomplished through a "one size fits all" approach. Each jurisdiction has a distinct set of conditions, opportunities, and financial constraints that needs to be respected and accommodated.

To accomplish flexible target-setting, we recommend that the final Year 2020 and Year 2035 targets be expressed in a narrower range of the draft targets versus a specific number.

To accomplish flexible target-setting, we recommend that the SCS process respect and reward creativity in the strategies that can be developed and accomplished by local jurisdictions, and recognize, as noted below, the severe funding constraints facing local jurisdictions today.



We also recommend that each MPO be recognized for its diversity, and that CARB not adopt an identical statewide, uniform GHG target that is assigned to each MPO in the state.

2. Adopt GHG Targets that Respect the Financial Resources Available to MPOs, County Transportation Commissions and Local Governments; Avoid Targets that are Out-of-Reach

We are well aware of the public testimony and public comments that the California Air Resources Board has been receiving from environmental, public health, transit and housing advocacy stakeholders to adopt aggressive GHG targets for SB 375 planning.

We are also cognizant of the significant role that local jurisdictions are expected to undertake in the planning, implementation, and monitoring of a breadth of strategies to reduce greenhouse gas emissions, not only from passenger vehicles but from a variety of GHG emission sources.

As you are aware, the timing of these new and heightened responsibilities assigned to local government for GHG emissions reduction strategies, is absent any guarantee of additional funding to local government to implement these strategies.

Further, as presented by the Honorable Cheryl Brothers, the Past President of the Orange County Council of Governments, at your July 20, 2010 public workshop, the timing of these new and heightened responsibilities for GHG reductions comes at a time when local jurisdictions are faced with unprecedented fiscal constraints that have already resulted in fewer staff to undertake more municipal responsibilities. These unprecedented fiscal constraints are also requiring local government to make difficult choices and priorities on what local services can be funded, and to what degree.

GHG targets for the SCAG region must respect economic and fiscal reality and be based on committed and available funding. There needs to be additional funding and financial incentives to enable local governments to have the adequate resources and tools to accomplish GHG planning in tandem with maintaining critical services to our communities such as police and fire protection, street repair, and community services.

The GHG targets that are adopted by CARB must also take into consideration and recognize the financial reality that transit operating funds and redevelopment funds – building blocks to SB 375 planning – have also been taken away from county transportation commissions and local government. These funding sources need to be restored.

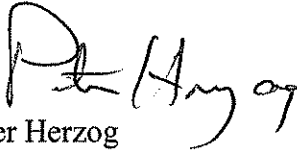
Let us therefore set forth with a realistic first step in target-setting that respects the limited resources available to local jurisdictions in this current economic climate, and have, as our final targets, a range that is realistic and achievable. Let us avoid targets that are aggressive and out-of-reach.

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Thank you for seeking input from local jurisdictions on SB 375 target setting. We hope that the recommendations and considerations voiced in this letter are considered by your staff and the Board of Directors when setting final GHG targets for the SCAG region in August 2010.

Sincerely,

CITY OF LAKE FOREST

A handwritten signature in black ink, appearing to read "Peter Herzog", written over the printed name.

Peter Herzog
Mayor