



# City of Mission Viejo

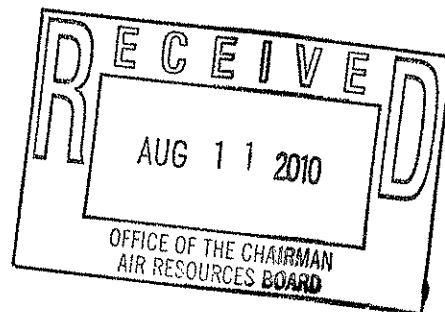
Office of the City Manager

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July 29, 2010

~ CORRECTED ~

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



***Subject: City of Mission Viejo Comments: Draft SB 375 Greenhouse Gas Target Setting***

Dear Ms. Nichols:

Thank you for the opportunity to review and comment on the proposed draft greenhouse gas (GHG) 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 Mission Viejo has actively monitored both the AB 32 Scoping Plan and SB 375 implementation through the working efforts of the Southern California Association of Governments (SCAG) and the Orange County Council of Governments (OCCOG). OCCOG, furthermore, is one of two subregions in the SCAG region that has elected to prepare a bottom-up, subregional Sustainable Communities Strategy that will be developed and integrated into SCAG's six-county Sustainable Communities Strategy.

The City of Mission Viejo also attended CARB's public workshop on GHG target-setting in Los Angeles on July 20, 2010, and has listened to many of the webcasts of CARB public hearings and workshops on GHG target-setting. The City of Mission Viejo appreciates the access and outreach that CARB has conducted, to secure input on the SB 375 target-setting process.

The City of Mission Viejo respectfully offers the following observations, recommendations and comments on GHG target setting:

1) **Respect the Role and Limited Resources of Local Government in SB 375 Integrated Planning:**

As you are well aware, local government is a fundamental and critical player to the success of the State's vision to effect reduced GHG emissions through optimized land use growth patterns that integrate with existing and emerging transportation systems.



The success of this partnership, however, is dependent upon a bottoms-up, participatory process that is aligned with realistic and reasonable GHG targets.

The City of Mission Viejo believes it is important to recognize that communities have been promoting and implementing good planning for many years, and have, by choice, implemented sustainable practices and programs and policies that improve air quality, reduce greenhouse gas emissions and reduce vehicles miles traveled, well before the adoption of the AB 32 Scoping Plan and SB 375 statute.

The City of Mission Viejo also believes it is important to point out that the State enacted SB 375 in absence of any source of guaranteed funding to provide resources for local jurisdictions to develop, analyze and implement additional strategies to reduce GHG emissions from passenger vehicles.

CARB's GHG target-setting for MPOs needs to be respectful of lingering financial and fiscal constraints facing local jurisdictions and county transportation commissions. Final target ranges need to be reasonable and achievable. Draconian targets that are aggressive and out-of-reach in these economic times will result in a loss of support from local communities.

2) **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 Metropolitan Planning Organization and each local jurisdiction has a distinct set of conditions, opportunities, and financial constraints that needs to be respected and accommodated.

SCAG has conducted an initial assessment of scenarios to assess the degree of GHG emissions that could be achieved with different mixes of strategies. SCAG has also identified that some of these scenarios are aggressive and unachievable.

To accomplish flexible target-setting that can guide SCS development during difficult economic times, 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, and that this narrower range of targets respects the region's requirement to adopt a Regional Transportation Plan that is financially constrained based on guaranteed and committed funding.

To accomplish flexible target-setting, we also 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 a statewide, uniform GHG target that is the same for each MPO.

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

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

The City of Mission Viejo recommends that the State set forth with a realistic first step in target-setting: one that respects the limited resources available to local jurisdictions in this current economic climate.

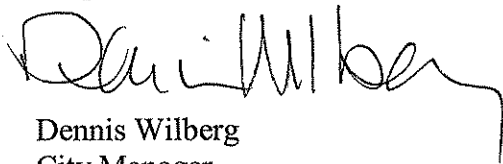
These new and heightened responsibilities for GHG reductions comes at a time when local jurisdictions are faced with unprecedented fiscal constraints that have already resulted in fewer staff to undertake more municipal responsibilities. These unprecedented fiscal constraints are requiring local government to make difficult choices and priorities on what local services can be funded, and to what degree. And local governments must continue to serve its communities and provide for critical services such as police and fire protection, street repair and community services.

Thus, final GHG target ranges need to be flexible, reasonable and grounded in fiscal reality, if local governments are to be productive partners in implementing the land use side of the GHG reduction equation.

Further, transit operating funds and redevelopment funds – fundamental building blocks to SB 375 planning which have been stripped from county transportation commissions and local governments – must be restored if SB 375 planning is to be taken seriously.

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.

Respectfully,



Dennis Wilberg  
City Manager

cc: City Council  
Planning and Transportation Commission  
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