



CITY OF FOUNTAIN VALLEY

CITY HALL 10200 SLATER AVENUE FOUNTAIN VALLEY, CALIFORNIA 92708

THE OFFICE OF THE MAYOR
Website: www.fountainvalley.org

(714) 593-4403 FAX: (714) 593-4494
Email: fvproud@fountainvalley.org

Mayor:
Larry R. Crandall

Mayor Pro Tem:
Cheryl Brothers

Council Members:
Guy Carozzo
John J. Collins
Steve Nagel

City Manager:
Raymond H. Kromer

City Attorney:
Alan R. Burns

July 29, 2010

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

RE: Draft SB 375 Greenhouse Gas Target for the SCAG Region

Dear Ms. Nichols:

The purpose of this letter is to provide City of Fountain Valley comment on the Draft Regional Greenhouse Gas (GhG) Emission Reduction Targets released on June 30, 2010. The draft proposes a 2020 target GhG reduction range of five to ten percent per capita from 2005 levels be established for the four largest metropolitan planning organizations (MPOs). The City of Fountain Valley has concerns with the one size fits all approach to the targets for all MPOs and the financial feasibility of achieving these targets in the economic times we are in and lack of alternative funding available.

The first concern that the City of Fountain Valley has in regards to the proposed targets is the one size fits all approach that has been taken in setting the target range for all the MPOs. Reducing GhG emissions cannot be accomplished through a "one size fits all" approach. Each MPO jurisdiction has a distinct set of conditions, opportunities, and financial constraints that necessitate different target considerations. Expecting the Association of Bay Area Governments and the Southern California Association of Governments to be able to achieve the same range of GhG reduction targets is not realistic as each embodies a very different culture, existing infrastructure, and fiscal constraints.

The second concern that the City has pertaining to the proposed targets concern the current state of local government finances and the ability for jurisdictions to take on the financially significant role of 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, is absent any guarantee of additional funding to local government to implement these strategies, which will make achieving these aggressive targets even more difficult.

Further, as presented by the Honorable Cheryl Brothers, Mayor Pro Tem and President of the Orange County League of California Cities, 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

Ms. Mary Nichols, Chair

July 29, 2010

Page 2

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 should be based on committed and available funding. Additional funding and financial incentives need to be available in order for local agencies to have the adequate resources and tools to meet the aggressive targets that are being set.

In closing we would also like to say that we are 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 groups to adopt aggressive GhG targets for SB 375 Planning. We urge the CARB to set the target sights on realistic targets that respect the limited resources available to local jurisdictions in this current economic climate, and have a GhG emission reduction target range that is realistic and achievable. We urge you to avoid targets that are aggressive and out-of-reach.

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,



Larry R. Crandall
Mayor

LRC/mm

c: City Council
OCCOG Board of Directors
League of California Cities
League of California Cities, Orange County Division