

CITY OF MANASSAS VIRGINIA

Office of the Mayor
9027 Center Street
Manassas, VA 20110

Telephone: 703/257-8213
Facsimile: 703/365-2060

October 20, 2009

MAYOR
Harry J. Parrish II

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CITY CLERK
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Mr. Stuart Freudberg
Director of Environmental Programs
Metropolitan Washington Council of Governments
777 North Capitol Street NE – Ste 300
Washington DC 20002-4239

Dear Mr. Freudberg:

This letter is in response for your request for comments on the 2012 Regional Climate Action Workplan which you reviewed with the MEEPC at its September 2009 meeting. This work plan is the first step in implementing COG's long term Climate Change Report as adopted by the COG Board on November 12, 2008.

Manassas supports the goals of energy efficiency and control of greenhouse gas emissions, and is willing to undertake our fair share of economically sensible programs to achieve these goals. There are, of course, both physical and economic constraints which must be recognized and incorporated into any work program.

- Primarily the need to protect our citizens and businesses from economic disadvantage which would be caused by costly requirements not common in neighboring states or overseas nations with which we compete.
- Secondly, we need to manage any new subsidy programs within fiscal restraints imposed by the current economic conditions and the reasonable role of government. This would apply locally to certain CEEPC "incentive" proposals and also nationally to the issue of subsidizing lesser developed countries to reduce their emissions.
- Thirdly, proposed actions should have a demonstrably beneficial environmental impact on the community in addition to being cost-effective.
- Fourthly, the administrative requirements should be reasonable

Some COG jurisdictions may have the financial resources and the social objective of accelerating actions faster than others or to a higher degree than others. Your work plan realistically recognizes this by citing different anticipated participation percentages in most work categories. This is an important element of the plan because different jurisdictions may have different priorities or realities with respect to individual proposed actions.

Work plan actions which we support include:

- Streetlight replacement with proven, economic, low energy products
- Adopt a green building "silver level" program for new municipal facilities
- Reduction of local government energy consumption by 10%. The regional target is by 2012, although Manassas will probably require a few years more because of the capital requirements associated with consumption reduction
- Consume 10% green energy in local government operations. In Manassas' situation, we have a long term electricity supply contract which has its own goals of 12% green energy by 2022 and 15% by 2025, consistent with Virginia legislation on this subject. We, of course, adopt and participate in our fair share of these reductions through the contract.
- Remove barriers to renewable technology within reasonable limits for an urban community
- Adopt a "green fleet" policy for local government vehicles. We agree policies should be formulated consistent with normal vehicle replacement, economic realities and the availability of fueling stations.
- Adopt best practices for traffic engineering to reduce vehicle miles
- Integrate greenhouse gas emission reductions into the Comprehensive Plan
- Promote green businesses and green jobs
- Concentrate future growth in regional activity centers. Manassas is one of the regional activity centers identified in your study and continues to actively promote local development convenient to transit systems.

Support for some other areas of the work plan is both philosophically and economically problematic in that the proposals assume the need to incentivize or subsidize actions which citizens or businesses could as well undertake in their own best interest when they find the actions economically attractive:

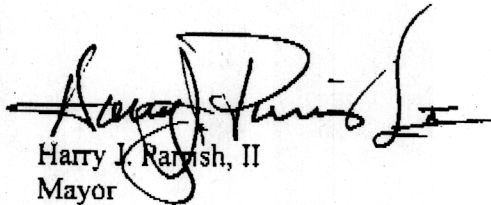
- A loan program to retrofit home energy improvements
- Subsidize consumer purchase of green energy
- Subsidize green business development

Finally, having a hard and fast target for near term greenhouse gas emission reductions presupposes that local governments have the ability to control such emissions and to do so without causing economic damage to the community. Clearly, we cannot control transportation-related emissions beyond what is done at the federal level. Residential emission, another major source, can be particularly difficult because of the large number of small locations. Admittedly, we can promote reduction in energy consumption through thermostat settings and conservation programs, but actually controlling and committing to a substantial greenhouse gas reduction based on actions of others is not realistic.

We are concerned about the administrative burden involved in identifying, inventorying, monitoring, reporting and controlling all these sites and the wide variety of greenhouse gases. We will, of course, be glad to discuss and try to develop a workable administrative program with COG.

The bottom line is that Manassas supports CEEPC's initiatives which have a positive impact, do not put our citizens or businesses at a competitive disadvantage, do not involve local subsidies and are practical to administer within existing staffing levels. We hope this input will be useful in developing the final proposal.

Allow me to acknowledge that this information has been discussed with City Council Members at a City Council Meeting. I wish to thank, in particular, Council Member Jonathan Way, our representative to COG in this matter.



Harry J. Parrish, II
Mayor

cc: L. Hughes, City Manager
City Council Members