

Historically, development in Riverside County was fueled by its proximity to the more urbanized coastal communities with their need for affordable housing, leading to an overabundance of bedroom commuter communities. Regional growth forecasts and development patterns throughout Southern California guarantee that Riverside County will continue to grow from its current population of 2.1 million, to 3.5 million by 2035, which emphasizes the demand for additional housing and jobs.

A key to the transformation of the existing and future communities and their environs into the sustainable, environmentally friendly ones needed to meet the AB 32 goals is the creation of local jobs, to sever the need for energy and time draining daily commutes. SB 375 directly focuses on the minimization of the "vehicle miles traveled" (VMTs) that constitute one of the primary sources for Green House Gas emissions, and the County fully supports this goal. There is, within Riverside County, a unique potential for the development of "Green" jobs, particularly in the area of alternative energy, to meet this need; our county is uniquely situated to play a major role in meeting the goals of your Executive Order S-14-08, which orders expanded renewable energy portfolios for electricity providers, by virtue of our wind, sunlight and geo-thermal resources.

Unfortunately, several studies now predict that implementation of AB 32 will cost small business billions of dollars, further slowing economic recovery and that essential job creation. On a more local level, we continue to hear references to regulations of and within the State as an obstacle to employment opportunities moving to or expanding within our County. Therefore, we cannot support further implementation of laws that at any level discourage local job creation.

In addition to slowing economic recovery and job growth, the direct cost to local government for the regulations cannot be ignored, especially in this era of fiscal crisis. AB 32 costs local governments in terms of manpower and scarce funds as cities and counties struggle to review and evaluate multiple proposals and decisions, and to develop coherent implementation plans to address the evolving, and at times contradictory, regulatory directives issued by the various State agencies with a stake in implementing AB 32.

Riverside County is committed to fulfilling its responsibilities to our residents and future generations of our County, the state and the world at large. Likewise, we endorse goals of environmentally friendly development and the efficient, sustainable land use planning.

We are not, however, convinced that the directive approach of the existing implementation strategies will be more effective than incentive or outcome based approaches more suitable for the projected development patterns of Riverside County. We believe that there is ample evidence that the market has identified and will promote sustainable development patterns consistent with the goals of AB32. Based on our existing built environment, we believe that there can be a role for large, sustainable "Master Planned" communities outside of existing developed areas to meet our responsibility to the future, despite the external emphasis on infill development alone.

Development, whether new, "infill" or redevelopment is essential for the physical changes needed to meet AB 32s goals. We believe any actions which inhibit or delay the economic recovery of the State and the region are detrimental to that development, and are the basis for your well thought inclusion of the language allowing suspension of the implementation.