



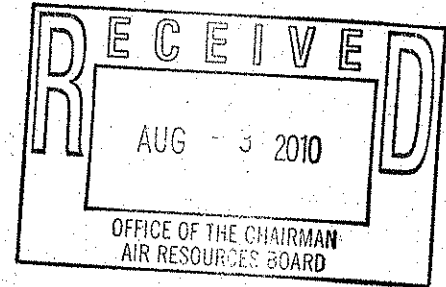
ORANGE COUNTY DIVISION

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"Serving the Public Servant"

July 28, 2010

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



On behalf of Orange County Cities, we are writing to comment on the recently-released Draft Regional Greenhouse Gas (GhG) Emission Reduction Targets, June 30, 2010 (the "Draft"). The Draft proposes that a 2020 target range of a five to ten percent per capita reduction in greenhouse gas emissions from 2005 levels be established for the four largest metropolitan planning organizations (MPOs). We vehemently oppose any increase to these targets at this time.

California's economy is facing unprecedented challenges. Clearly, great uncertainty surrounds our state's immediate future. Our current unemployment rate stands at 12.4% -- third highest of all states and up over 1.1% from a year ago. Studies show that California has been losing manufacturing jobs faster than comparable states. When one factors in chronic state and local government budget deficits, an annual highway transportation funding shortfall of \$4 billion that is on top of a nearly \$7 billion public transportation funding shortfall, a dimming retail picture, slumping consumer confidence, an overall downshift in growth and a new residential construction market that is performing at historic lows, the likelihood of any significant economic turnaround anytime soon is extremely unlikely.

The increased targets proposed are overly ambitious and dangerous to our beleaguered economy. Furthermore, as local governments struggle to balance their budgets and provide core services to California residents, funding is simply not available to conduct the planning required to meet these reductions. We are deeply concerned that setting targets at such levels will further harm the ability of the California economy to recover to healthy production levels.

We strongly urge the ARB to reject any increase to the 2020 targets in light of the prolonged economic downturn.

Sincerely,

Jerry Amante
President
Orange County Division, League of California Cities

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