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September 20, 2011

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

Dear Chairperson Nichols and Members of the California Air Resources Board,

Thank you for the opportunity to comment on San Diego's Draft Sustainable Communities Strategy (SCS) prepared by the San Diego Association of Governments (SANDAG) pursuant to the Sustainable Communities and Climate Protection Act of 2008.

As a member of the Senate who voted in favor of SB 375 (Steinberg), and as the Senator representing a large area of San Diego County, I have closely followed SANDAG's work in preparing the first Sustainable Communities Strategy to be submitted to the California Air Resources Board (CARB) for review. The draft Regional Transportation Plan and SCS for San Diego County have generated a great deal of interest within our region, with over 4000 responses from more than 1500 individuals to the draft documents submitted.

While I commend SANDAG for its comprehensive effort to comply with SB 375, I am disappointed in the draft SCS that has been submitted to CARB. San Diego's SCS may well meet the technical requirements of the legislation and implementing regulations, but it does not meet the legislative intent of SB 375: to set California on a course to permanently reduce greenhouse gas emissions and in the process reduce the effects of climate change.

The issues raised by Attorney General Kamala Harris in her September 16th letter to the SANDAG Board of Directors reflect my concerns. The state is already dealing with the effects of climate change including sea level rise, increased average temperatures, coastal erosion, and the increased frequency and intensity of wildfires including the 2003 and 2007 wildfires that took lives and homes within San Diego County.

The region is home to some of the leading authorities in global warming and climate change. Unfortunately, the draft SCS does not reflect the information available from the studies that have made these local institutions among the world's preeminent experts in the field of greenhouse gas emissions and climate change.

Equally troublesome is the effect that the region's inability to consistently meet federal air quality standards has on public health. Particulate levels and local air pollution data require an aggressive mitigation plan, and the SCS should be modified to implement such a strategy. Failure to do so will have short and long term effects on public health. This is especially true for those neighborhoods located along the region's extensive freeway system and adjacent to industrial and commercial operations. Our transportation corridors rely on the use of heavy duty trucks with their diesel emissions now and in the future.

When I voted for SB 375, it was with the understanding that each metropolitan planning organization in the state would implement strategies identified through their adopted SCS to reduce greenhouse gas emissions. The concept was that through innovative and consistent transportation and land use strategies California would see a reduction in vehicle miles traveled. That, in turn, would reduce greenhouse gas emissions. Under its draft SCS, the San Diego region in 2050 would only reduce its vehicle miles traveled by 1% over current levels. That is not a significant improvement.

The CARB staff recommendation in its Informational Report dated September 13, 2011, states that the San Diego region would meet the target emission reduction goals set by CARB of 7% in 2020 and 13% in 2035, but in 2050 would actually increase its greenhouse gas emissions over the emissions level in 2010. The SCS indicates that there would be a 14% reduction in 2020, 13% reduction in 2035 but only a 9% reduction in 2050.

I strongly recommend that the Air Resources Board encourage SANDAG to modify its draft Regional Transportation Plan and Sustainable Communities Strategy to improve the effectiveness of the plans so that the emission reductions in 2050 exceed those required in 2035. That would demonstrate that the region is committed in its efforts to comply with AB 32 and SB 375 in reducing greenhouse gas emissions and the effects of climate change.

Sincerely,



CHRISTINE KEHOE
Senator, 39th District

Attachment: Letter from Attorney General Kamala D. Harris to SANDAG Chairman Jerome Stocks dated September 16, 2011 regarding the Draft Environmental Impact Report for 2050 Regional Transportation Plan and Sustainable Communities Strategy