



AB 32 Implementation Group

Working Toward Greenhouse Gas Emission Reductions
And Enhancing California's Competitiveness

September 20, 2011

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

RE: Comments on San Diego County's draft Sustainable Communities Strategy

Submitted Electronically:

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=sandiego11&comm_period=N

Dear Chair Nichols:

Thank you for the opportunity to comment on the draft Sustainable Communities Strategy (SCS) prepared by San Diego County.

The AB 32 Implementation Group is a coalition of business and taxpayer interests with the mission is to be a constructive voice in the implementation of the *Global Warming Solutions Act of 2006* and ensure that greenhouse gas emission reductions are achieved in a balanced manner while maintaining the competitiveness of California businesses.

SB 375 builds on the existing regional transportation planning process to connect the reduction of greenhouse gas (GHG) emissions from autos and light duty trucks to local land use and transportation policy. SB 375 was carefully constructed to maintain bright lines between regional planning and local land use authority and autonomy. SB 375 is an "incentive-based" program with the overall framework established in state law but with the development and implementation of the plans and strategies determined at the local level.

We applaud the efforts of the San Diego Association of Governments for the expertise and transparency that defined the development of the draft SCS now before the California Air Resources Board. The issue before the Board is whether the draft SCS puts the San Diego region on a path to achieve its 2020 and 2035 GHG emission reduction targets. ARB staff's evaluation is that SANDAG has demonstrated that the draft SCS, if implemented, would meet the GHG emissions targets for 2020 and 2035. There is no evidence to justify a rejection of the draft plan. For this reason we urge the Board to approve the San Diego County SCS.

It is critical that all state and local policymakers involved in the vast undertaking related to reaching our climate related goals respect the roles of each jurisdiction and cooperate to achieve outcomes that work for all. While some stakeholders would like to see the SCS process produce different outcomes, it is the responsibility of the Board to acknowledge ARB staff analysis that the plan will achieve the reduction targets, and to therefore support the decision of SANDAG.

We respectfully request that the California Air Resources Board accept the SANDAG SCS as drafted.

Respectfully,

Shelly Sullivan, Executive Director