CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE

Asian Pacific Environmental Network • Center for Community Action & Environmental Justice • Center on Race, Poverty & the Environment
Communities for a Better Environment • Environmental Health Coalition • People Organizing to Demand Environmental & Economic Rights
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September 22, 2010

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

Re: CARB SB 375 Greenhouse Gas Reduction Targets

Dear Chairman Nichols,

The California Environmental Justice Alliance (CEJA) is an alliance of six environmental justice organizations with strong community bases in distinct regions of California. Our organizations have long histories of working together in various state, regional and national coalitions over the past 20 years. These efforts resulted in critical accomplishments such as hazardous waste site clean up regulations; worker and community right- to-know laws; air toxics regulations and local land use and zoning successes. The mission of the California Environmental Justice Alliance is to strengthen the progressive environmental justice movement in California by building on the local organizing efforts and advocacy successes of our member organizations to achieve state policy change. We focus on California's communities in the San Francisco Bay Area, the Los Angeles region, the Inland Valleys, and the San Diego / Tijuana border region.

We understand that on September 23, 2010, California Air Resources Board (CARB) will adopt regional greenhouse gas (GHG) reduction targets. We urge you to take this opportunity to adopt the strongest possible targets under SB 375.

CEJA strongly supports aggressive GHG reduction targets for 2020 and 2035, as well as development of a strong implementation plan to meet those targets. We are equally committed to ensuring that any target or implementation plan incorporate environmental and social justice principles and ensure that the needs of environmental justice communities drive the planning process.

TARGETS MUST BE MORE AGGRESSIVE

The CARB staff recommendation is to accept the targets developed by the regional MPOs. We are concerned that the MPO target levels are based on pre-existing regional transportation plans, and that the MPOs are not being challenged to revise their

transportation planning to move faster toward meeting AB32 goals. While we understand that the 2020 targets must reflect past transportation planning decisions, we expect a more aggressive target for 2035. Reliance on the existing RTPs represents a business-as-usual strategy that fails to move California away from the failed transportation and land use path of the past. It ensures that California will fail to achieve the AB 32 regional GHG targets for both 2020 and 2050.

In order to create a healthy, thriving and clean region, CEJA recommends the following targets as minimum levels.

Year	**Smaller Regions**	**Larger Regions**
2020	10-15%	15-20%
2035	15-20%	20-25%

Aggressive targets are particularly important for California's environmental justice communities. There are numerous reasons that EJ communities are more impacted by vehicle emissions and need more rapid reductions.

- Environmental justice communities, including both urban and rural communities, have greater than average levels of particulate matter in our ambient air;
- Our communities are also the most impacted by diesel emissions from freight transport, agricultural equipment, and industry;
- Our communities are those closest to large emission sources such as airports, seaports, intermodal facilities, and freeways;
- Our communities are demographically more vulnerable to health consequences from exposure to air pollutants;
- Our communities have greater need for comprehensive land use planning that provides public transit to job centers, health care facilities, and schools;

IMPLEMENTATION PLAN MUST RESPECT AND ADHERE TO EXISTING NEIGHBORHOOD PLANS

As important as setting the right targets, we urge the regional MPOs to develop an effective implementation plan that respects the rights and needs of environmental justice communities and ensures that these communities share equally in the benefits of SB 375 implementation.

Environmental justice communities already suffer from disproportionate impacts from the effects of multiple pollution sources such as freeways, Port operations, major industrial waterfront activities, circulation of diesel trucks and small industrial operations mixed in with homes, schools and parks. Thus, any plan adopted by MPOs to reduce GHG emissions regionally must have even greater emission reductions in these impacted communities, while also ensuring that communities remain affordable and avoid gentrification.

Further, the implementation plan must respect and adhere to the already developed land use plans of local neighborhoods. As examples, two environmental justice

communities, Barrio Logan in San Diego and Old Town National City, have recently developed updated community plans driven by the needs and desires of the community. These plans, developed in successful partnership with the Cities of San Diego and National City, are transit-oriented, using smart growth principles such as increasing density and jobs, improving walkability and mobility, moving industry away from residential areas, and increasing access to affordable transit. These visions are at risk without assurances that neighborhood planning, especially in environmental justice communities, is the driving force for GHG emissions reduction plans.

These plans, and other environmental justice community plans, matched land use and transportation needs that reduce GHG exposure through the existing community planning processes, and should be looked at as models for how to create urban infill communities ready for increased transit opportunities and reduced exposure to GHG emissions.

The undersigned organizations look forward to continuing to work with CARB and our MPOs to develop meaningful targets and adopt an implementation plan that improves the health and quality of life for our regions, most particularly environmental justice communities.

Sincerely,

Antonio Diaz, Executive Director
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