

## ARB Docket Comments System (docket)

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**From:** Albert Perdon [<mailto:albertperdon@albertperdon.com>]

**Sent:** Friday, January 26, 2018 8:10 AM

**To:** Communications@EPA <[CEPAComm@CALEPA.ca.gov](mailto:CEPAComm@CALEPA.ca.gov)>

**Subject:** Senate Bill 375 Sustainable Communities Program Public Workshops

In its 2017 staff report, CARB has identified a targeted 19.8% emission reduction by 2035 relative to emission levels in 2008. This reduction target is 21% below the level CARB has stated is needed in order to achieve State of California mandates. SB 375 mandates a 25% emission reduction compared to 2005. The target emission reduction is lower than what is required. It leads to significantly lower future reductions than are possible compared to the 19.8% target. ARB has not considered the most important strategy for achieving realistically possible emission reductions.

As stated in its report, CARB recommendations for emission reductions are presented pursuant to the Sustainable Communities and Climate Protection Act of 2008, as proposed by the State Legislature in Senate Bill SB 375, and as approved by the Governor and enacted into law as Chapter 728, Statutes of 2008. While SB 375 sets a mandate for emission reductions, it is subject to another more over-riding mandate set by the voters in 2008. This voter-approved mandate is Proposition 1A, the Safe, Reliable High-Speed Passenger Train Bond Act. This act of the People, sets precedents over an act of the Legislature.

Proposition 1A mandates the implementation of actions to build an 800-mile high-speed train system stretching from Sacramento and the San Francisco Bay area to San Diego. Successful implementation of this system requires the co-commitment of creating 24 new, very high-density, auto-free cities along the High-Speed Train corridor. Creation of these new cities in conjunction with the High-Speed Train system will enable 15% or more of Californians to avoid owning and operating a motor vehicle, with a commensurate reduction in vehicle emissions.

CARB does not recognize the Proposition 1A voter mandate in its current update. Nor does it consider the full scope of possible future emission reductions that would result from this mandate. The short-coming in the CARB staff recommendations that lead to a lower-than-mandated reduction in air emissions must be corrected before the CARB Board adopts the Update to the SB 375 Greenhouse Gas Emission Reduction Targets.

Please include this comment in the Public Workshop hearing scheduled for Tuesday, February 13, 2018 from 6:00 p.m. - 8:00 p.m. at the Sherman Heights Community Center, 2258 Island Avenue, San Diego, California 92102, and at the public hearing of the CARB Board when it considers adoption of the staff report.

Thank you.

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