



California Building Industry Association

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North State Building Industry Association  
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September 21, 2011

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

Subject: **SAN DIEGO COUNTY DRAFT SUSTAINABLE COMMUNITIES STRATEGY (SCS)**

Dear Chair Nichols:

The California Building Industry Association (CBIA), a statewide trade association representing 5,000 member-companies involved in residential and light-commercial construction, respectfully requests that the California Air Resources Board accept the San Diego County Association of Governments' (SANDAG) SCS as drafted.

As you know, CBIA was a key participant in the legislative negotiations that led to the enactment of Senate Bill 375 (Chapter 728, Statutes of 2008). Following that effort, homebuilders fully engaged the Regional Targets Advisory Committee (RTAC) in developing a process to fully ensure that the regional greenhouse gas (GhG) reduction targets set last year by the Board -- including for the San Diego region -- were reasonable, achievable and consistent with the objectives of state housing law. Though at times we have reserved the right to express concerns when we believe a proposal negatively impacts housing, constrains jobs, is harmful to the economy or attempts to turn SB 375 into a delivery mechanism for social goals that have little to do with the bill's central mission of stemming the rate of GhG emissions, we have steadfastly been committed to doing our part to assist the state in the achievement of its GhG reduction goals.

With regard to the SANDAG SCS, it is important to note that this is the first SCS to be prepared in California. SANDAG is to be complimented for the time, effort, expertise and transparency that went into the public vetting and development of the RTP/SCS. Because the San Diego region has a long and impressive history of planning for growth in a way that attempts to balance the interests of both the economy and the environment, the SCS not only meets the targets for 2020 and 2035 but goes even further by nearly doubling the 2020 per capita targeted reductions set by the Board. While a unique set of circumstances made this possible, the leadership at SANDAG is to be recognized for its dedication and ingenuity in constructing a plan that attempts to achieve significant greenhouse gas emission reductions from vehicular travel while accommodating the growth and employment needs necessary for the long-term health and sustainability of the region.

Although we continue to question some of the assumptions built into the plan regarding the type, density and location of housing between now and the year 2035, we believe on balance that it is a valuable plan that deserves to be recognized and accepted by the California Air Resources Board.

Respectfully,

Richard Lyon  
Senior Vice President