

June 29, 2010

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



**Re: CARBs greenhouse gas reduction targets under SB 375 and implementation plan**

Dear Chairman Nichols,

Environmental Health Coalition is a 30-year-old, nonprofit environmental health and justice organization that works in the San Diego-Tijuana region. A majority of our work is focused on land use, air quality, and respiratory health in the low-income communities of color that surround San Diego Bay, including the portside communities of Barrio Logan in San Diego and Old Town National City. On behalf of EHC, we applaud your efforts to reduce air pollution. We understand that California Air Resources Board (CARB) will soon release regional greenhouse gas (GHG) reduction targets and we urge you to take this opportunity to adopt the strongest possible targets under SB 375.

EHC would like to convey the importance of setting aggressive targets to reduce our region's greenhouse gas emissions, as well as developing 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**

We strongly support aggressive targets for 2020 and 2035. While we understand that the 2020 targets will be lower due to past transportation planning decisions, we expect a more aggressive target for 2035. Reducing passenger vehicle emissions by a total of only 13% by 2035 is unacceptable and sets us on the same failed transportation and land use path of the past. It also sets us up to miss AB 32 regional GHG targets for both 2020 and 2050. In order to create a healthy, thriving and clean region, we must set 2035 vehicle emission GHG targets to at least 20-25%.

**IMPLEMENTATION PLAN MUST RESPECT AND ADHERE TO EXISTING NEIGHBORHOOD PLANS**

As important as setting the right targets, we urge our region's MPO, SANDAG, to develop an effective right 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 SANDAG 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. Two environmental justice communities, Barrio Logan 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 National City, are transit-oriented using the foundation of 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 plan.

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

We look forward to continuing to work with CARB and SANDAG to develop meaningful targets and adopt an implementation plan that improves the health and quality of life for the San Diego region, most particularly environmental justice communities.

Sincerely,



Georgette Gómez  
Director, Toxic Free Neighborhoods Campaign