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September 27, 2011

Honorable Jerome Stocks
Chair, Board of Directors
San Diego Association of Governments
401 B Street, Suite 700
San Diego, CA 92101

**RE: 2050 Regional Transportation Plan/Sustainable Communities Strategy Draft
Environmental Impact Report Revision Request**

Dear Chairman Stocks and Honorable Members of the Board,

Environmental Health Coalition (EHC) is a 30-year old environmental justice organization committed to building healthy communities in the San Diego/Tijuana region. We empower people and organize communities to achieve justice. We strongly support Attorney General of the State of California, Kamala Harris' comments regarding the Draft 2050 Regional Transportation Plan (DRTP) and Sustainable Communities Strategy (SCS). EHC encourages the SANDAG Board to act on Attorney General Harris' demand for a revision of the Draft Environmental Impact Report (DEIR) due to insufficient analysis of the environmental justice impacts. Since San Diego's SCS will serve as the model for other California Metropolitan Planning Organizations, it is critical to ensure that the document includes transportation projects and transit networks necessary to ensure compact urban development and less environmental health impacts over the next 40 years.

Low-income, communities of color suffer from some of the worst air pollution and asthma rates in San Diego County, with high levels of pollution coming from freeways and diesel trucks. SANDAG has the opportunity with the RTP/SCS process to mitigate the impacts of such pollution. However, the DEIR shows that particulate pollution will increase over the life of the DRTP/SCS and lacks an analysis of the public health effects this increase will cause. The increase in particulate emissions in the DEIR, the emphasis on the Goods Movement Strategy in the RTP/SCS and the DEIR's recognition that goods movement will be largely done by diesel trucks all warrant a comprehensive public health analysis of the RTP/SCS with a special focus on the Goods Movement Strategy. This analysis is required under CEQA and we urge SANDAG to conduct it because particulate pollution is of special concern to already burdened communities.

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The SCS under SB 375 is required to integrate transportation and land use strategies to produce a downward shift in GHG emissions in the state. However, the DRTP/SCS would expand highways in the early years of the Plan and defer investment in most transit projects to the middle or end of the 40-year planning horizon. These auto-centered strategies that temporarily reduce GHG emissions are not acceptable. Accordingly, EHC is significantly concerned that the RTP/SCS defers plans for investment in transit. We urge the SANDAG Board to prioritize its efforts to reduce vehicle emissions and vehicle miles traveled by creating safe, effective, and affordable transportation options for community members -- with a new focus on walking, biking, and multi-functional transit systems.

Moreover, the current Environmental Justice analysis itself is deficient as it solely focuses on access to transit by underserved communities and does not assess the health impacts these communities currently face and the increased impacts with the project's implementation. As the Attorney General states, a proper environmental justice analysis should identify sensitive communities that will be affected disproportionately by the acknowledged increase in pollution. This analysis should disclose the full scope of air pollution and health effects along with a proposal of mitigation measures for localized air quality impacts. The SCS required by law must serve to stabilize the climate and avoid an even greater environmental injustice on those communities that will carry the burdens of air pollution and climate change.

We strongly urge you to amend the DRTP, SCS and DEIR to prioritize efforts to reduce vehicle emissions and vehicle miles traveled. This should be done by creating safe, effective, and affordable transportation options that satisfy CEQA requirements and that will accomplish the project's first fundamental objective of providing an environmentally sustainable transportation system while fostering efficient concentrated land development patterns that improves air quality in the region.

The San Diego region is at a turning point and has not only the obligation to mitigate the impacts overburdened communities face but also the opportunity to create a healthy and vibrant region for generations to come. Please contact Jessica Parra-Fitch with any questions or for further information at 619-474-0220 ext 115.

Sincerely,

Diane Takvorian
Executive Director

Jessica Parra-Fitch
Policy Advocate

cc: Gary Gallegos, Executive Director, San Diego Association of Governments