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**Seyed Sadredin**  
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September 17, 2010

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

**RE: Proposed Regional Greenhouse Gas Emission Reduction  
Targets for Automobiles and Light Trucks Pursuant to  
Senate Bill 375**

Dear Ms. Nichols:

On September 16, 2010, the San Joaquin Valley Air Pollution Control District Governing Board adopted a policy position on the establishment of SB 375 targets in the San Joaquin Valley. As you know, eight of the State's Metropolitan Planning Organizations (MPOs) are located in the San Joaquin Valley (this includes the eastern portion of Kern County that is outside the District boundaries.) The following comments and recommendations reflect the Valley Air District's position on this matter, which was supported by the eight MPOs in the Valley.

The San Joaquin Valley Air District strongly supports measures aimed at reducing vehicle miles travelled resulting in reductions of criteria pollutant emissions as well as greenhouse gasses. More than 80% of the Valley's ozone and precursor emissions are attributed to mobile sources. As the public health agency responsible for achieving clean air goals for Valley residents, we support stringent targets that will yield real reductions in mobile source emissions by promoting necessary changes in historic land-use patterns. Towards that end, ARB must set targets at levels that are ambitious and achievable.

In achieving this delicate balance, the Air Resources Board (ARB) must be mindful of the inherent limitations of SB 375. As you know, SB 375 does not mandate meeting the targets, and does not provide financial incentives or disincentives to enforce the targets. In our opinion, the targets must be high enough to promote smart growth and the necessary investment in transportation infrastructure through design and implementation of Sustainable Community Strategies. On the other hand, unrealistically high targets will leave local entities with no choice but to resort to developing Alternative Planning Strategies (APS) as provided under SB 375. Although SB 375 extends CEQA

relief to projects that comply with an APS, forcing MPOs in this direction will result in minimal or no meaningful reductions in emissions.

In establishing these targets, ARB must also adhere to its long-held tradition of utilizing best available science. ARB staff has correctly acknowledged major deficiencies that currently exist in the transportation models, particularly in the Valley. The State of California has awarded \$2.5 million in Proposition 84 funds to enhance the Valley's models, and CARB is providing \$800,000 in funding to develop an updated region-wide travel model based on an updated statewide travel model currently under development. Additionally, the District is contributing \$250,000 toward this effort.

After carefully considering all of the above, the San Joaquin Valley Air Pollution Control District offers the following recommendations:

- 1) Based upon best available data and current modeling work, Valley-wide targets of 2% for 2020 and 5% for 2035 represent appropriate placeholder targets for the Valley, recognizing that achieving Valley-wide targets will require much greater reductions from the larger metropolitan areas in the Valley.
- 2) The above targets shall serve as placeholders, with a firm commitment from the Valley MPOs, the District, and ARB to enhance the models and reevaluate these targets beginning in 2012 and set new targets supported by the best available data in 2014 as provide for by SB 375.

Also, as a point for future consideration, the District believes that in measuring compliance with SB 375 targets there are some projects that are outside of local government control. In particular, vehicular traffic associated with developments on Federal lands over which the MPO or its members have no land-use decision making authority should not be included when determining compliance with SB 375 targets.

I want to thank you and your staff in advance for your consideration of these issues. Please feel free to contact me at (559) 230-6036 if you have any questions.

Sincerely,



Seyed Sadredin  
Executive Director/APCO