## Merced County Office of Education

Lee Andersen, Superintendent

February 14, 2008



Equal Opportunity Employer

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

RE: CARB staff recommendations for target corridor allocations under the Proposition 1B GMERP

Dear Ms. Nichols:

As Merced County Superintendent of Schools, part of my responsibility is to advocate for the education of all children in the County and the region. The impact of our poor air quality on children's health, school attendance and school performance is well documented. Thus I am compelled to strongly object to the direction taken by your staff in defining our air quality improvement needs, the schedule for remedying those needs and the fund allocation to accomplish the task.

This is to request that the recommendations of staff be changed as follows related to describing and alleviating regional air quality issues be changed as follows:

- The emissions reductions needed to bring the San Joaquin Valley into attainment of the 24-hour ozone standard by 2017 must be included in the calculation under the "SIP Needs" criteria.
- The "Goods Movement Emissions" criterion should be applied based on the latest official inventory numbers those that CARB has asked the air districts to use for their SIP plans.
- Population figures should be normalized using per capita exposure to goods movement emissions
- The target allocations be adjusted to assure the Central Valley a minimum allocation of 37% of the bond funds.

As they stand, the staff recommendations contradict the general directions of the Governor for fair distribution of resources for improvement of San Joaquin Valley air quality. If used as the basis for implementation they will irreparably harm the health and educational performance of many thousands of children.

Sincerely

LEE ANDERSEN

Merced County Superintendent of Schools

LA:yc

Governor Arnold Schwarzenegger
CalEPA Secretary Linda Adams
CARB Board Members

Mr. James Goldstene, CARB

Mr. Seyed Sadredin, San Joaquin Valley Air District

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