



January 29, 2008

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

Dear Chairman Nichols:

On behalf of the Merced County Board of Supervisors, I am writing to express concern over the recent draft report which included the allocation of the Proposition 1B funding for the "Goods Movement Emission Reduction Program." We are deeply concerned over the 25% proposed allocation for the Valley. The San Joaquin Valley is impacted by 45% of the goods movement related diesel truck emissions generated in the four corridors identified as being eligible for Prop.1B funding. We feel it is prudent to allocate the most funds in areas with the biggest challenges, and where emissions from diesel trucks and locomotives do the most damage.

We believe that an objective, needs-based analysis justifies that at least 37% of the Proposition 1B Air Quality funding should be allocated to the Central Valley. The increased allocation to the Valley is based upon the following factors:

- Inclusion of the required emissions reductions to bring the Valley into attainment of the 8-hour ozone standard by 2017 in the "SIP Needs" factor.
- Utilization of the official emissions inventory for "Goods movement emission" factor.
- Utilizing a per capita pollution exposure weighting in the "Population" factor

As you are aware, the San Joaquin Valley faces significant air quality challenges. Over the past year the Air Resources Board (ARB), the San Joaquin Valley Air District Board, and the Governor have all expressed a desire to accelerate the attainment of clean air standards in the San Joaquin Valley, and we support that goal. The ARB established a task force to seek opportunities to achieve additional emissions reductions to bring the San Joaquin Valley into attainment sooner rather than through the identified regulatory strategies. The Guideline's allocation to the San Joaquin Valley calls ARB's commitment to this path into question, as you are allocating scarce air quality resources.

We can not emphasize enough that the problems which exist in the Central Valley are every bit as important as those in Southern California and deserve a greater share of the allocation. We appreciate the opportunity to voice our concerns on behalf of the people of Central California and hope that you will favorably consider our argument.

Sincerely,

Kathleen Crookham  
Chairman, Merced County Board of Supervisors

ORIGINAL: Board Clerk  
Copies: Executive Officer  
Chair

## Board of Supervisors

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Supervisor, District One

Kathleen M. Crookham  
Supervisor, District Two

Michael G. Nelson  
Supervisor, District Three

Deidre F. Kelsey  
Supervisor, District Four

Jerry O'Banion  
Supervisor, District Five

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**BEFORE THE BOARD OF SUPERVISORS  
COUNTY OF MERCED, STATE OF CALIFORNIA**

**In the Matter of**

**RESOLUTION SUPPORTING AN INCREASE  
IN THE STATE AIR RESOURCES BOARD  
ALLOCATION OF PROPOSITION 1B FUNDING  
FOR THE SAN JOAQUIN VALLEY AND THE  
AIR POLLUTION CONTROL DISTRICT**

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) **RESOLUTION NO. 2008-17**  
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**WHEREAS**, the San Joaquin Valley Unified Air Pollution Control District (District) is a duly constituted unified district, as provided in California Health and Safety Code (CH&SC) Sections 401.50 to 401.61; and,

**WHEREAS**, in November of 2006, California voters approved Proposition 1B authorizing \$1 billion in bond funding to reduce air pollution and health risk along California's priority trade corridors; and,

**WHEREAS**, in the January 3, 2008 ARB staff report on the Proposition 1B Emissions Reduction Incentive Program, ARB staff proposed to allocate only 25% of the Proposition 1B air quality mitigation funding to the entire Central Valley trade corridor, which includes both the San Joaquin Valley Air Pollution Control District and the Sacramento Metropolitan Air Quality Management District; and,

**WHEREAS**, in the above-mentioned proposal for allocating the Proposition 1B funding, ARB staff relies on goods movement emission inventory figures that have not been officially sanctioned, lack technical justification, and are not consistent with numbers used in State Implementation Plans; and,

**WHEREAS**, in the above-mentioned proposal for allocating the Proposition 1B funding, ARB staff ignores the San Joaquin Valley's need for expedited attainment of the federal 8-hour ozone standard by 2017, even though State Officials, including ARB members and Governor Schwarzenegger, have expressed their commitment to attaining the federal 8-hour ozone standard in the Valley by 2017; and,

**WHEREAS**, in the above-mentioned proposal for allocating the Proposition 1B funding, ARB staff relies on population figures without considering per capita population exposure to air pollution; and,

**WHEREAS**, the District's 2007 Ozone Plan identifies substantial new emission -reductions that are needed to attain the health-based ambient air quality standards for 8-hr ozone and also for particulate matter less than 2.5 microns in diameter (PM2.5) implemented by the United States Environmental Protection Agency (EPA); and,

**WHEREAS**, the District's 2007 Ozone Plan shows that regulatory programs alone will not provide the emission reductions needed to meet federal Clean Air Act requirements for the federal 8-hr ozone and PM2.5 standards; and,

**WHEREAS**, heavy-duty diesel trucks used for goods movement in the San Joaquin Valley are by far the Valley's largest single source of smog-forming oxides of nitrogen; and,

**WHEREAS**, emissions from heavy-duty trucks are under the primary regulatory jurisdiction of the state and federal governments, not the District; and,

**WHEREAS**, the San Joaquin Valley north-south trade corridor comprised of Highway 99 and Highway 5 carries more heavy-duty truck traffic than any other goods movement corridor in the state, 45.9 percent of the total vehicle miles traveled (VMT) for the four major goods movement corridors; and,

**WHEREAS**, the San Joaquin Valley, due to its topography and meteorology, faces a greater challenge in improving air quality than any other area of California; and,

**WHEREAS**, a higher level of goods movement air quality mitigation funding than proposed by ARB staff would help serve the needs of the Valley's diverse low-income population by reducing exposure to air pollution from goods movement; and,

**WHEREAS**, the District has an outstanding track record of effectively using incentive funding to achieve meaningful emissions reductions;

**NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:**

The Merced County Board of Supervisors urges the ARB to:

- Use officially sanctioned heavy-duty truck emissions inventories in calculating goods movement air quality mitigation funding allocations; and
- Consider the San Joaquin Valley's need for expedited attainment of the federal 8-hour ozone standard by 2017 in developing goods movement funding allocations; and
- Consider the San Joaquin Valley population's exposure to air pollution, and not just the population numbers, in the formula for establishing goods movement funding allocations; and
- Reaffirm their commitment to eliminating violations of health-based air quality standards in the San Joaquin Valley by allocating at least 37% of the total Proposition 1B goods movement air quality mitigation funding to the Central Valley.

**I, Demitrios O. Tatum**, Clerk of the Board of Supervisors of the County of Merced, do hereby certify that the foregoing resolution was regularly introduced, passed and adopted by said Board at a regular meeting thereof held on January 29, 2008, by the following vote:

**Supervisors**

Ayes: Kathleen M. Crookham, John Pedrozo, Mike Nelson, Deidre F. Kelsey, Jerry O'Banion

Noes: None

Absent: None

Witness my hand and the Seal of this Board this 29th day of January 2008.

DEMITRIOS O. TATUM, Clerk

By Com. Pelletti  
Deputy

