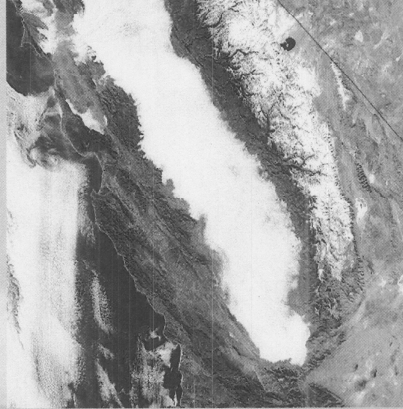


Valley's Challenges Are Unmatched

- Pollution-trapping meteorology and geography
- Extreme Ozone nonattainment area
- PM2.5 non-attainment area
- Valley is principal north-south goods movement corridor
- Goods movement is largest source of emissions
- Major sources under primary jurisdiction of ARB/EPA
- Environmental Justice



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Why does it matter to all of us?

- **1 in 6 children suffer from asthma** (higher than South Coast)
- **Health impacts, each year** (2004-2006 data)
 - **460 premature deaths** (South Coast 5,400 premature deaths based on 1999-2000 data – same year/method comparisons similar)
 - **325 new cases of chronic bronchitis**
 - **3,230 cases of acute bronchitis in children**
 - **260 hospital admissions**
 - **23,300 asthma attacks**
 - **188,000 lost school days**
 - **3,000 lost work days**
- **\$3 billion/year in health related costs**

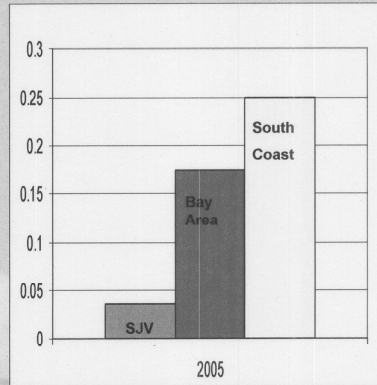


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Valley has very low tolerance for pollution

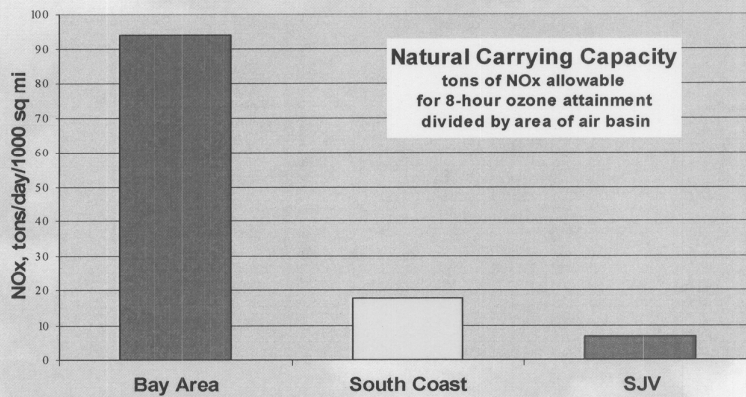
- *Chart compares Valley emissions density with Bay Area and Southern California*
- *Emissions much less than in SF or LA*
- *Bay Area enjoys clean air*
- *South Coast air quality only marginally worse*

ROG + NOx
tons/day per square mile



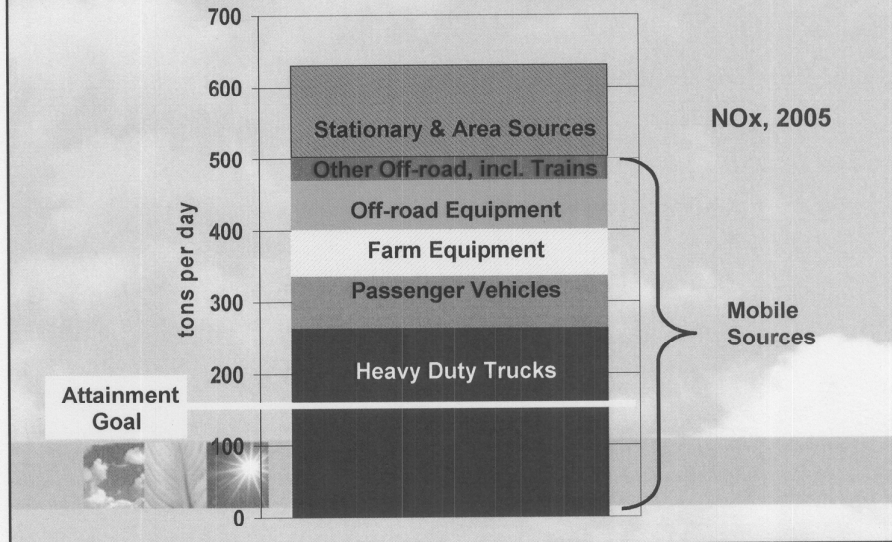
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Valley has very low tolerance for pollution



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Attainment Depends on Reductions from Mobile Sources
Local District has no legal authority over 80% of the emissions

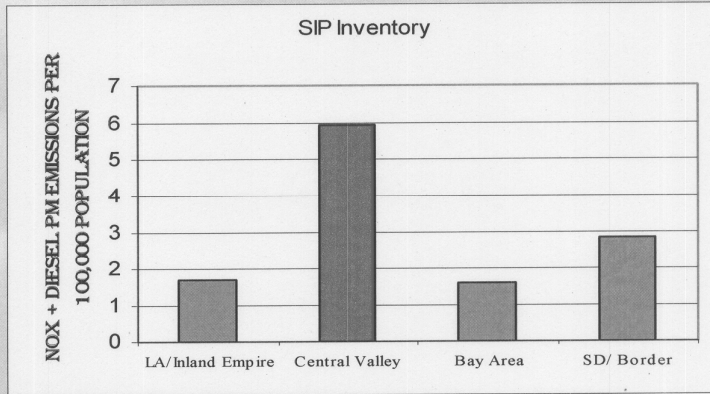


Valley's SIP Needs for Ozone

- ARB and SJV District committed to early ozone attainment in 2017
- Valley the only corridor committed to a 2017 ozone attainment date
- Valley's attainment 2017 attainment gap should be considered



Per Capita Exposure to Goods Movement Emissions - Highest in San Joaquin Valley



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Impact of Heavy Duty Trucks in Four Trade Corridors

	Attainment Designation	HHDT VMT In 2010 (1000 mi/day)	NOx emissions from HHDT in 2010 (tons/day)	PM emissions from HHDT in 2010 (tons/day)	8-hour ozone exceedance days in 2006
San Joaquin Valley	Extreme	8635	213	8.9	86
South Coast	Extreme	6733	140	7.1	86
San Francisco	Marginal	2542	50	2.0	12
San Diego	Basic	1302	26	1.2	14
SJV % of total		45%	50%	46%	44%



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Use Correct Emissions Inventory

- Must use official PM2.5 and Ozone SIP inventory
- Problems with draft truck inventory estimate
 - Not yet peer-reviewed
 - Lacks documentation
 - Does not incorporate results of ARB Ag survey
 - Activity within air basin should not be based on location of registration
 - Estimates 50% of Valley travel is out-of-state trucks
 - Estimates average Valley truck age at only 7 years
- Agree with ARB on need for field studies



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Use of Raw Population as a Factor

- Must take into account exposure, not just raw population
- With the Valley's challenging meteorology and topography, each ton of emissions has a much greater impact
- SJV has the highest per capita exposure to goods movement emissions
- Enabling legislation does not specify raw population as a criteria



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Ensure Broadest Statewide Benefits

- Agree with ARB's stated goal
- All corridors are impacted by inter-regional traffic
- Need additional safeguards to ensure multi-corridor benefits
- Require minimum 25% expenditure on multi-corridor projects
- Consistent with Carl Moyer multi-district program component



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Suggested Changes to Implementation Guidelines

- **Funding Caps**
 - \$50,000 per truck replacement
 - \$5,000 per retrofit device
 - Suggest increase funding up to 80% of vehicle cost
 - Correspond with established Moyer Program criteria
- **Truck Trade Down**
 - Wider range of model years should be eligible
 - Expand from 2003-2006 to 1998-2006
 - Funding not available for retrofit device in trade down
 - Cost-effective projects should be evaluated based on the merits of their emission reductions



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RECOMMENDATIONS

- Use official up to date SIP inventory
- Add safeguards to ensure broadest statewide benefits
- Adjust guidelines to remove impediments to effective utilization of the funds
 - Funding caps
 - Tiered truck replacements



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