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February 28, 2008

Chairwoman Nichols and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**Re: Support for Proposition 1B Goods Movement Emissions Reduction
Guidelines for Implementation**

Dear Chairwoman Nichols and Members of the Board:

As an organization of physicians who seek to provide excellence in medical care for residents of the San Joaquin Valley, Fresno Madera Medical Society commends the work of the California Air Resources Board for its attentiveness to the San Joaquin Valley pollution situation and its vigilant efforts to work alongside Valley advocates and regulators for reduced pollution – quickly – for Valley residents.

We would like to thank you for the critical reductions you found during the CARB Task Force process as well as your current work on the Heavy Duty Diesel Truck Rule that will significantly reduce diesel pollution statewide. The work you have undertaken on the Prop 1B guidelines is also commendable, true to the spirit of the initial SB 88 legislation, and crafted with deep listening to Valley and statewide constituencies. We thank you for the current levels of funding that the San Joaquin Valley is slotted to receive.

In reviewing the Prop 1B guidelines, we would like to particularly recognize CARB's achievements in:

- 1) Setting rigorous requirements for local agencies and equipment operators that will ensure a just stewardship of public funds. The accountability in the expenditure of these funds will ensure that we meet crucial pollution reduction goals.
- 2) Maintaining allegiance to specified mitigation projects rather than broader transportation infrastructure projects for which there are other monies available.
- 3) CARB's insistence that reductions under this program are not available for emissions reduction credits.

4) CARB's commitment to ongoing examination and support of state and local low-interest loan programs.

5) Inclusions in the guidelines for outreach to independent drivers.

These achievements in the guidelines, among others, ensure a process to reach targeted statewide reductions. Thank you.

In your final deliberations today, we realize that this important funding is a tenth of what is needed to clean California's air, and its proper allocation is critical. Every bit counts.

Therefore we offer three items for your consideration.

First, we encourage CARB to update and solidify, if it has not done so already, the emissions inventory utilized in the decision-making process.

Secondly, CARB is well-aware that goods movement is the single largest source of emissions in the San Joaquin Valley, and that about 45% of all truck miles traveled and associated emissions occur in the Valley. We know that any truck that travels through the Valley, regardless of its origin, that is retrofitted, repowered, or replaced will have benefits for Valley air quality. We ask that, to the extent possible, CARB work to ensure the "co-benefit" that can happen with allocations to other Air Districts for trucks that run through the Valley. Special attention to trucks at their point of origin that end up spending half or more than half of their time running up and down Highway 99 or Interstate 5 will help us a great deal.

Lastly, we must share with you our deep concern over the proposed state budget cuts that will drastically compromise health care access for low-income families - families who are disproportionately affected by air pollution-related illnesses and have greater barriers to healthcare access. No healthcare network in the state will escape reductions in quality care for the underserved. Los Angeles County health officials, for example, have already announced the proposed closure of all but one of the County's 12 clinics and reduced services at outpatient health centers.

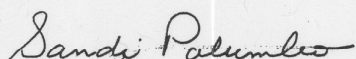
Just as the Valley has specific geographical challenges that trap pollution, so also the Valley has some unique challenges in health care provision and access. The San Joaquin Valley suffers from a higher percentage of Medi-Cal enrollees per population than the state as a whole and most other regions of the state. Conversely, reimbursements to providers for Medi-Cal services are *lower* than any other region in the state. We have a higher number of uninsured residents, for all or part of the year, than the state as a whole and most other regions in the state. (1, 2) We also have the lowest physician-to-patient ratios in the state. Our region has fewer primary care physicians and specialists, per 100,000 residents than any other area. This is particularly acute with physician specialists - we have half the number of specialists practicing in Southern California and a third of the number of specialists in the Bay Area. Difficulty to recruit physicians to the area lies

in part with these dynamics coupled with the air pollution realities that deter needed specialists – cardiologists, pulmonologists – from coming, or staying.

In short, we are struggling to care for those who are struggling to breathe.

The Fresno Madera Medical Society has already begun conversations about what its member physicians can do to augment cut Medi-Cal services. It is from this vantage point that we commend you for your continued aggressive work to reduce emissions in the Valley. We thank you for the work that you have done in the guidelines and thank you as well for your consideration of these comments.

Sincerely,



Sandi Palumbo
Executive Director

(1) UCLA Center for Health Policy Research (2007). *2005 California health interview survey* [Data Files]. Available from <http://www.chis.ucla.edu>

(2) California HealthCare Foundation. Medi-Cal county data. Available at: <http://www.chcf.org/topics/medical/index.cfm?subsection=countydata>