

September 22, 2010

Mary Nichols, Chairman
California Air Resources Board
submitted electronically

RE: Support Staff Recommended Targets for the San Joaquin Valley

Dear Chairman Nichols and Members of the Air Resources Board:

On behalf of the residents and communities of the San Joaquin Valley, we are writing to voice our support for staff's recommended placeholder targets of 5% and 10% for the eight MPOs in the San Joaquin Valley. We urge you to reject any last-minute attempts to undermine these targets and instead focus on improving models and providing resources that will help us achieve successful implementation of SB 375 in the San Joaquin Valley.

The Valley is the fastest-growing region in California, and faces huge air quality challenges that affect our health and well-being as well as our economy. 80% of the air pollution in the Valley comes from mobile sources. SB 375 provides an opportunity not only to help reduce global warming, but also to improve the Valley's air quality and make our communities healthier and safer, protect farmland, and improve mobility for our residents.

The proposed targets of 5% for 2020 and 10% for 2035 represent a reasonable placeholder for the Valley and are a logical next step for achieving the vision of the San Joaquin Blueprint. A new analysis of the Valley Blueprint scenarios by Vision California/Calthorpe Associates (attached) demonstrates that a reasonably ambitious smart growth scenario for the Valley would result in a 12% reduction in GHGs by 2035. By locating a greater share of new development in existing communities, this smart growth scenario would also create numerous other benefits for the Valley, including:

- Eliminate almost 14,000 tons of air pollution
- Save 600 million gallons of fuel per year
- Save the average household \$3,600 per year in fuel and energy costs
- Protect 375 square miles of farmland from development
- Saves 18,000 gallons of water per year for each new home built

While these are placeholder targets that will be revisited in 2012, it is important for the Valley's leaders and the Air Resources Board to affirm their commitment to the Valley's future. The last-minute recommendation to lower the targets to 2% for 2020 and 5% for 2035 would be a step backward and send a message that the Valley lacks a serious commitment to cleaning the air, protecting farmland, and improving our communities.

While some may argue that 2% and 5% are ambitious targets, there is little evidence to support that assertion and significant evidence to contradict it. For example, Fresno COG's submission to ARB in May 2010 stated that their existing, adopted Regional Transportation Plan would result in GHG reductions of nearly 2% by 2020¹ -- the same level that they now claim would be an "ambitious" target. How can this be considered an ambitious target when they already expect to achieve it without any change from

¹ Fresno COG SB 375 Greenhouse Gas Reduction Target Presentation, May 25, 2010, slides 6-8.

business as usual? Moreover, while Kern COG predicts higher emissions in 2020 and 2035, Kern COG's own analysis shows that by just making minor shifts to bring new homes and jobs closer to city centers, the County could reduce per capita emissions by 5% by 2035.² Other strategies that were not evaluated could reduce Kern COG's emissions further, and in 2012, improved modeling technology will allow us to more fully calculate the reductions from strategies already underway. The unique geography and economy of Kern County are not typical of the Valley as a whole, making greater reductions possible in other counties and allowing a higher Valley-wide average.

We therefore urge you to support staff's recommended targets of 5% and 10% for the Valley. We are grateful for your leadership on SB 375 and we look forward to working with you when the targets are revisited, and when implementation gets underway.

Sincerely,

Autumn Bernstein
Director
ClimatePlan

Kelly Mitchell
Executive Director
Tulare County Citizens for Responsible Growth

Tom Frantz
President
Association of Irrigated Residents (AIR)

Emily Schrepf
Senior Coordinator Clean Air and Climate
National Parks Conservation Association

Elizabeth Jonasson
Campaign and Outreach Associate
Coalition for Clean Air Now

Sarah Sharpe
Environmental Health Director
Fresno Metro Ministry

Linda MacKay
President
TriCounty Watchdogs

Mario Talavera
President
Latinos United for Clean Air

Catherine Garoupa White
Director
Central Valley Air Quality Coalition

² Kern COG SB 375 Greenhouse Gas Reduction Target Presentation, May 25, 2010, slide 9. The strategy shifts 17 percent of new homes and 27 percent of employment growth toward infill areas. Additional analyses could consider the possible impact of other strategies, such as shifting transportation investments away from roads and highways and toward transit, vanpools, bike lanes and walkways.