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September 20, 2010

Mary Nichols, Chair
Board Members
California Air Resources Board
Via online submission, ARB website

Re: SB 375 Target Setting

Ms. Nichols and Members of the Board:

The Center on Race, Poverty & the Environment submits these comments regarding the recommended greenhouse gas reduction targets for the San Joaquin Valley. CRPE is a non-profit environmental justice organization that has worked with low income and minority communities in the San Joaquin Valley for twenty years. Cities within the Valley are consistently in the top most polluted cities in the Nation.[1] The Board has an opportunity to make a strong statement about its commitment to reducing greenhouse gases in the Valley and throughout the state. SB 375 mandates targets to be "ambitious and achievable." The key to achieving real results, pushing technology, and smart planning decisions is to make sure the targets are truly ambitious and not just achievable, especially for the San Joaquin Valley, one of California's most polluted air basins.

Staff has recommended targets for the Valley MPOs of 5% by 2020 and 10% by 2035. While this is stronger than the draft targets of 1-7% for 2020 and 2035, we believe the Board should go even further and that even more ambitious targets can be set. The July public workshop in Fresno to discuss the draft targets was well attended by community members and activists working on Valley air pollution issues. The majority of the comments centered on increasing the targets to make sure that steps were really taken to clean the air and reduce greenhouse gases. We are glad to see that these comments were taken into consideration and the recommended targets are higher, but the Board should do even more.

[1] Bakersfield and Fresno are in the top 5 most polluted cities in the U.S. for both PM 2.5 and Ozone, Kern County is in the top 3 most polluted counties for PM2.5 and Ozone, other Valley cities and counties are in the top 10. American Lung Association State of the Air 2010. http://www.stateoftheair.org/

Strong targets will push the Valley MPOs to incentivize new technologies and investments in existing technologies, as well as smarter planning that goes beyond business as usual. Valley residents are ready to do what it takes to decrease greenhouse gases and air pollution. This was made evident in the San Joaquin Valley's blueprint process, where a vast majority of the over 500 participants in the final workshop voted for the highest-density alternative. The participants understood that drastic changes to the regular way of business and planning must be made and adopting strong targets is one way to ensure this happens.

In addition to strong targets for the Valley, the Board should not approve a regional target for all the Valley MPOs. A regional target will allow game play between the Valley counties and will result in less effective greenhouse gas reductions. Some areas could likely see increases in greenhouse gas emissions and each county will not have the incentive to adopt smart plans for their growth. The purpose of SB 375 is to promote smart growth and decrease emissions, and a regional target is not acceptable and will not achieve this purpose.

Lastly, strong ambitious targets are needed for the Sustainable Community Strategy each MPO will prepare to achieve the targets set by the Board. It is important to remember that SB 375 allows limited CEQA review for qualified projects within a region shown to meet the targets set by the Board. This future streamlining of the CEQA process places an enormous responsibility on the Board to set aggressive targets to lay a solid foundation for future planning and projects.

In light of the significance this decision has on the future planning in California, we sincerely hope that the Board takes this opportunity to set strong, ambitious targets that go beyond the staff's recommendations, but at the very least, does not fall below the 5% in 2020 and 10% in 2035 proposed by the staff[2].

Thank you for your consideration,

/s/

Sofia Parino
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The Center on Race, Poverty & the Environment.

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[2] In an extremely disappointing move, last week the San Joaquin Valley Air District voted to ask this Board to approve lower targets than the ones recommended by staff. Once again, the District ignores the plight of the residents of the Valley and seeks least aggressive solutions for the Valley, asking for ridiculously low targets. The Board should not lower the targets for the San Joaquin Valley.