

10-8-2

**From:** Steve Madison  
**Sent:** Wednesday, September 22, 2010 1:32 PM  
**To:** 'dd'  
**Subject:** CARB Targets related to SB 375 GHG Reductions

Dear Ms. D'Adamo:

I am writing to you on behalf of hundreds of members of the local home building industry who are central to the successful implementation of SB 375. SB 375 is a bill that this association and its members supported because it is our understanding that it would create a more rational approach to land use planning and a unified approach of to achieving effective greenhouse gas emission (GHG) reductions.

Unfortunately, the targets being proposed by the California Air Resources Board staff are well beyond what we anticipated. The potential additional economic expense to consumers through fees, taxes and increased gas prices is an unwelcome burden, particularly given the serious economic challenges we currently endure. While the poor economy should not be a deterrent to implementing programs that reduce GHG, we are having difficulty in abiding by the "more is better" approach that staff has apparently recommended in terms of the increased percentage of GHG reduction targets that your board may choose to impose. We are not alone in this regard, as even the San Joaquin Valley Air Pollution Control District board believes that the proposed targets ought to be less aggressive.

Finally, as you know, there have been a series of stakeholder sessions that focused upon setting targets that are both economically feasible and which can be reasonably achievable. During these sessions, numerous experts and local elected and appointed officials have presented valid economic and scientific arguments as to the reasonableness of what can be done. It appears to me that staff work by Air Resources Board may supersede the entire fact-finding effort. In light of previous misfires, is again following a rigid staff recommendation the best path that CARB should choose?

Thank you for your consideration on this important issue.

Stephen D. Madison  
Executive Vice President  
Building Industry Association of Central California  
900 H Street, Suite E-2  
Modesto, CA 95354

Phone: (209) 529-4531 ext. 11  
Fax: (209) 529-0566