



July 28, 2017

Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: SB 375 Regional Greenhouse Gas Emission Reduction Targets Update for Valley MPOs**

Dear Chair Nichols, Air Resources Board members and staff,

We thank you for the opportunity to provide comments on the Proposed Update to the SB 375 Greenhouse Gas (GHG) Emission Reduction Targets. The undersigned organizations work directly with residents of disadvantaged communities throughout the San Joaquin Valley. We are writing to ensure that the proposed targets are as ambitious as possible and that co-benefits are maximized for these communities.

**Co-Benefits of Aggressive SB 375 Regional GHG Targets for Disadvantaged Communities**

Ambitious greenhouse gas reduction targets encourage regions to think differently about land use and transportation and make such decisions with equity and climate in mind. Equitable transit investments and improved transportation infrastructure in low-income, disadvantaged communities allows residents to access jobs and educational opportunities they may not otherwise have access to. Prioritization of active transportation infrastructure in these communities will improve public health. Improved interconnectivity between communities will allow residents to access basic services such as medical clinics, attorney services, and grocery stores that are non-existent in their own communities. For example, the community of Cantua Creek, located in rural Fresno County, has recently been awarded a grant for an electric vanpool program, *Van y Vienen*, which connects residents to nearby cities and runs wherever and whenever folks need to travel.<sup>1</sup> The program, developed by resident leaders, should serve as a model for the non-traditional modes of transit regions can be implementing to reach climate goals and increase mobility. By ensuring SB 375 targets are as ambitious as possible, the San Joaquin Valley region will benefit from cleaner air, healthier and more mobile citizens, smarter land-use decisions, and a host of other co-benefits.

**Land Use Planning in the San Joaquin Valley**

---

<sup>1</sup> Delgadillo, Natalie. 'How an Eco-Friendly Rideshare is Changing Life in a Tiny Rural Town.' June 7, 2017. [www.governing.com/news/headlines/gov-eco-friendly-rideshare-cantua-creek-rural-california-unincorporated.html](http://www.governing.com/news/headlines/gov-eco-friendly-rideshare-cantua-creek-rural-california-unincorporated.html)

While we understand and agree that the San Joaquin Valley is unique, ultimately the region as a whole experiences similar economic, air quality, climate and social equity challenges. The Central Valley is the fastest growing region in the state of California and is projected to experience the highest population growth in the coming decades.<sup>2</sup> Additionally, many cities throughout the San Joaquin Valley consistently rank among the most polluted cities in the entire nation.<sup>3</sup> According to CalEnviroScreen 3.0, the majority of the state's most disadvantaged communities are located in this region, with a significant number of Valley residents dealing with a slew of environmental and socioeconomic issues. Additionally, every county in this region relies on similar land use and new-growth development patterns -- that is, large sprawling new neighborhoods and new towns on the outskirts of existing communities. The argument that counties within this region are unique is overstated, and should not be the reason for differences in MPO targets. Rather, MPO targets should be as aggressive as possible to combat the very issues that plague the region - especially land-use decisions that exacerbate GHG emissions.

Land-use patterns in the San Joaquin have often favored low-density development at the periphery of existing communities. For example, Madera's proposed "New Town" (e.g. Riverstone and Tesoro Viejo) is on the outskirts of existing community boundaries. This planned community will be comprised of brand new market-rate, single family homes and will likely increase vehicle miles traveled (VMTs). Meanwhile, residents in Fairmead, an unincorporated, low-income community in Madera County, are still not connected to basic utilities such as water, wastewater, or sewer.

Fresno's proposed Friant Ranch development and existing Copper River Ranch development demonstrate this prioritization as well. Friant Ranch is planned to be a large, high-end development on the outskirts of Fresno, specifically for more affluent individuals. Copper River Ranch, a newer, luxury home development in northeast Fresno, does not offer many housing opportunities for low-income residents, nor is it located near any major transit hubs, likely resulting in an increase of greenhouse gas emissions from passenger vehicles of residents traveling to and from the development.

Merced's Ferrari Ranch project, praised for bringing jobs and tax revenue to the Merced area,<sup>4</sup> is yet another example of sprawl development and deprioritization of existing communities. This 3 million square-foot, multiple-phase development will cost millions of dollars and would require the annexation of land along with utility extensions such as water, wastewater, and sewer. Many residents in the county's unincorporated disadvantaged communities, such as Delhi, have yet to be connected to wastewater and sewer services in their neighborhood and rely on private septic tanks and wells. Furthermore, the chosen scenario for the 2014 RTP/SCS amendment only allocated 3 projected new jobs for the community of Le Grand between 2008 and 2035, a prime example of the ways in which disadvantaged communities are often overlooked when it comes to economic development.

---

<sup>2</sup> CalTrans, *California County-Level Economic Forecast 2016-2050*. October 2016.  
[http://www.dot.ca.gov/hq/tpp/offices/eab/index\\_files/2016/FullReport2016.pdf](http://www.dot.ca.gov/hq/tpp/offices/eab/index_files/2016/FullReport2016.pdf)

<sup>3</sup> American Lung Association. State of the Air Report 2017. <http://www.lung.org/assets/documents/healthy-air/state-of-the-air/state-of-the-air-2017.pdf>

<sup>4</sup> Miller, Thaddeus. 'Atwater to get an update on Ferrari Ranch Project...' March 2017.  
[www.mercedsunstar.com/news/local/community/atwater/article138550503.html](http://www.mercedsunstar.com/news/local/community/atwater/article138550503.html)

These examples reflect a common trend in this region -- low-density development at the periphery prioritized over infill development. These land use decisions maintain the need for residents to drive daily and continue the neglect of rural, disadvantaged areas. They are therefore in direct contradiction to the state's climate goals and the objectives of SB 375. This target setting process is an opportunity for ARB to influence these decisions and, by implementing ambitious regional greenhouse gas reduction targets, require MPOs to come up with equitable, climate-conscious solutions to transportation challenges and shift resources to communities that need it most.

**Need for Additional Data and Stronger Analysis**

We support ARB's approach in applying a 1-2% additional reduction to the MPO's currently adopted 2014 RTP/SCS performance. However, we would like to see a robust analysis demonstrating that these targets are as aggressive as possible. The four largest MPOs analyzed GHG reductions of various strategies and scenarios and submitted quantitative test results. We suggest that the Valley MPOs also conduct this analysis and submit results so that ARB may more thoroughly assess their targets. As laid out, local land-use planning decisions are not being made with considerations to climate and social equity. Therefore we urge the Air Resources Board conduct an assessment of the geographic distribution of all MPO funded projects, including the population served by each project and the impact of the project on greenhouse gas emissions and VMTs. We believe this analysis could be useful for identifying land-use planning and policy opportunities that are not yet being utilized. This would also help with evaluating the ambition and feasibility of regional SB 375 targets.

Our current state climate goals are incredibly ambitious and we will need more reductions from all sectors to attain them. Since greenhouse gases from transportation account for the largest portion of our state's total emissions,<sup>5</sup> California must see significant reductions from this sector. The SB 375 target-setting process offers an opportunity for the state to influence transportation and land-use planning to align with state climate goals.

\* \* \* \* \*

Thank you for the consideration of these comments. We look forward to continuing to collaborate with you during this process.

Sincerely,

Nikita Daryanani  
**Leadership Counsel for Justice and Accountability**

Kevin Hamilton  
**Central California Asthma Collaborative**

Marty Martinez  
**Safe Routes to School National Partnership**

---

<sup>5</sup> California Greenhouse Gas Emission Inventory Program. [www.arb.ca.gov/cc/inventory/data/data.htm](http://www.arb.ca.gov/cc/inventory/data/data.htm)

Dolores Barajas-Weller  
**Central Valley Air Quality Coalition**

Caroline Farrell  
**Center on Race, Poverty, & the Environment**

Adam Livingston  
**Sequoia Riverlands Trust**

Jim Grant  
**Roman Catholic Diocese of Fresno**