



Help for Today...
Hope for Tomorrow

Catholic Charities Diocese of Stockton

Testimony before the California Air Resources Board Regarding the 2012 PM 2.5 Plan January 24, 2013

Elvira Ramirez
Executive Director

BOARD MEMBERS

Bishop Stephen E. Blaire
President

Mark Croce, CPA
Board Chair
Interim Treasurer
Croce & Co.

John Solis
Vice Chair
Work Net SJ
Executive Director

Dr. Elmano Costa
Secretary
CSU, Stanislaus

Monsignor John Armistead
Cathedral of the Annunciation
Pastor

John Curtis, CPA
Boss Deller and Co.

Donna Dominguez
St. Anne's Catholic Church
Director Communications and
Community Development

David Kirkpatrick
Retired Attorney at Law

Yvonne Leal
CSU Stanislaus

Saroya Leonardini
Neumiller and Beardslee
Attorney at Law

Digna Ramirez-Lopez
Diocese of Stockton
Hispanic Apostolate Director

John Souza
Retired Teamsters Labor
Representative

My name is Betsy Reifsnider, Environmental Justice Director for Catholic Charities, Diocese of Stockton. The Diocese includes the counties of San Joaquin, Stanislaus, Calaveras, Tuolumne, Alpine, and Mono.

I wish to speak in favor of strengthening the Indirect Source Rule (ISR). The District is rightfully proud of its "ground-breaking" and "first-of-its-kind" regulation. The ISR is good, but it doesn't go far enough in helping the San Joaquin Air District to achieve its 2012 PM 2.5 Plan.

As far back as December 15, 2005, at a hearing of the San Joaquin Air District governing board, parish leaders from the Stockton Diocese spoke in favor of adopting the original Indirect Source Rule. In written testimony, Catholic Charities noted, "Although the proposed Indirect Source Rule Package, if enacted, will only reduce NOx emissions by 20%, the *draft establishes a valuable framework that can be enhanced over time.*" Even eight years ago, we thought the ISR needed strengthening.

That time has come. The San Joaquin Air District should expand the Indirect Source Rule to:

- Improve the connection between ISR fees the Air District collects and the actual emission reductions achieved by a developer. At present, the ISR fee structure does not offset emissions on a one-for-one basis, but it should.
- Make sure that mitigation measures actually take place. Development agreements, CEQA documentation, and Voluntary Emission Reduction Agreements could be in place before the Air District approves the ISR for a proposed project.
- Work to improve communications among land use, transportation, and other agencies that have roles in approving or rejecting a development.
- Provide advanced credit options for projects that go beyond the minimum requirements.

In 2006, St. Joachim parish in Lockeford was subject to the Indirect Source Rule when it built a new parish hall. Despite fears of the pastor, the ISR was not an impediment. Indeed, the ISR made the project more energy efficient and cost effective. Staff members at the San Joaquin Air District were very helpful in guiding the pastor, the architect, and the contractor through the ISR process.

If strengthened, the Indirect Source Rule can be an even more innovative, cost-effective regulation and a more effective tool in reducing PM 2.5 pollution. Thank you.



STOCKTON OFFICE 1106 North El Dorado, Stockton, CA 95202 / phone: 209-444-5900 / fax: 209-444-5933
MODESTO OFFICE 400 12th Street, Suite 4, Modesto, CA 95354 / phone: 209-529-3784 / fax: 209-529-6083
MOTHER LODE OFFICE 14855 Mono Way, Suite 101, Sonora, CA 95370 / phone: 209-532-7632 / fax: 209-532-8448

Seizing the Opportunity

Using the San Joaquin Valley Sustainable Communities Strategies
to advance health, sustainability, and shared prosperity

Regional Transportation Plans (RTP) and Sustainable Communities Strategies (SCS) can jumpstart the region's economy, save families money, improve public health, reduce air and water pollution and strengthen the agricultural sector. In 2012, over 30 groups sent a letter to the Regional Policy Council describing strategies to create a more healthy, prosperous and equitable region while reducing air pollution and greenhouse gases (GHGs): <http://bit.ly/VbuQSA>.

Public Health: Our transportation investments can provide residents the opportunity to make healthier choices and support cleaner air. Embracing health-oriented planning will allow over 100,000 San Joaquin Valley children with asthma to breathe cleaner air and will begin to reverse epidemic levels of obesity, diabetes, heart disease and other chronic illnesses that affect hundreds of thousands of Valley residents.



Simulation of revitalized main street.
(Photo credit: Urban Advantage)

Economy: As demographics shift, meeting the growing demand for walkable communities will help keep homes affordable and attract long-term economic growth. Existing land use growth patterns burden households with costly commutes and tax local governments with expensive infrastructure. Investing in existing communities can put that money to better use, and targeting those investments to communities that have been historically left behind will produce the greatest returns Valleywide.



Photo credit: San Joaquin RTD via flickr.
(Not an endorsement of this brochure.)

Equity and Opportunity: Efforts to reduce greenhouse gases will best succeed when they serve historically overlooked communities and expand opportunities for everyone. Low-income, especially rural, communities often lack basic features of healthy, sustainable neighborhoods – potable water, sewer systems, safe and affordable homes, adequate public transit, parks, sidewalks, streetlights and essential services. Our planning must address these inequities to meet its full potential.



Lanare residents with rural transit bus.
Photo credit: Veronica Garibay

Watersheds and Working Lands: An acre of farmland can add up to \$15,000 to the local economy annually, and the Sierra provides our water. Focusing growth and investment in existing communities can begin to reverse decades of land use and transportation planning decisions that have contributed to poor air quality and allowed for growth at the expense of critical farmland and foothills.



Farm in Tulare County.
Photo credit: Mary Murphy

Complete Communities

Focus growth and investment to improve existing urban and rural neighborhoods, creating sustainable places to live for people of all incomes

Encourage investments that strengthen existing rural and urban neighborhoods by creating a growth scenario that prioritizes infill and maximizes the portion of new homes and jobs built within these communities. Housing development and infrastructure improvements should occur within a defined growth area that encourages efficient use of space and community sustainability.

Envision healthy places to live where daily needs are close to home. Residents of all incomes should have easy, nearby access to jobs, housing, shopping, schools, public transit, and medical services. Scenarios should maximize the percentage of residents from both urban and rural settings who live in such neighborhoods and the health benefits of being able to do more daily travel by foot or bike.

Measure household costs for transportation and housing among rural and urban residents as a whole, and among lower income tiers. Scenarios should minimize households' expenses and reduce the need to drive long distances by completing existing communities, providing jobs and amenities close to home, and offering alternatives to driving.

Partner with local governments – especially of small, rural communities – to develop and implement a comprehensive strategy to address inadequate infrastructure, including roads, sidewalks, curbs, gutters, wastewater systems, drinking water systems, and public transit throughout the county. With local agencies, the region should analyze infrastructure needs and then identify funding sources and financing mechanisms that local governments can utilize for planning, building and maintaining infrastructure.

Use available funds to support and incentivize the growth described in this document. Regions should prioritize transportation projects that invest in existing communities and support walkable, mixed-income neighborhoods. Funding should be distributed to incentivize and support local governments planning to build these neighborhoods.

Sustainable communities strategies offer real opportunity

Transportation

Provide Valley residents of all incomes with a variety of transportation options—such as rail, bus, and vanpools—and safe and comfortable routes for walking and biking

Front load and increase investment in non-motorized transportation projects and policies. In their latest plan, Southern California tripled investments in walking and biking infrastructure, and the Sacramento region allocated 8% of all funds to these investments. Prioritize investment in places that lack pedestrian and bicycle infrastructure and in places with lower rates of vehicle ownership.

Front load and increase transit investments and operations funding to improve connectivity within and between Valley communities via high-quality bus, train, and vanpool services. The Sacramento region's plan directed 33% of its budget to transit, while most Valley COGs allocate less. To minimize riders' wait times, strive to run key bus lines at 15 minute frequencies and explore cost-effective technology to make real-time bus arrival information available.

Increase funding allocations for innovative mobility options – such as real-time ride-sharing, carpooling, maxi-taxi, dial-a-ride, and van pools – to better connect underserved and rural communities to jobs, schools, and shopping. These tools may best help Valley communities meet their pollution reduction targets because they work within existing infrastructure constraints and demographics.

Prioritize repair and maintenance investments in existing streets and roads above building new or widening existing roads. Budget for the maintenance of any new road infrastructure. All road maintenance and rehabilitation projects should include or anticipate complete streets components as much as possible.

Prioritize spending on projects that deliver maximum health benefits for residents, especially those living along freeways and freight corridors, and prioritize projects that advance the cleanest freight technologies. Map new developments that are likely to be located in close proximity to freeways and high traffic roadways under the new RTP and evaluate potential pollution exposures as well as possible remedial measures.

Housing

Provide a diversity of housing options for all income levels; and consider the jobs/transit/housing fit

Include a growth scenario that matches market demand as determined by the recent Concord Group analysis, including 61% single family, 14% townhomes, and 25% "rental flats," and by Arthur C. Nelson's "San Joaquin Valley Scenario," where single family demand for new construction consist largely of smaller lots (≤ 5000 sq. ft.), with little new demand for conventional lots. The scenario should include homes suitable and affordable to all household sizes and prioritize infill development and growth within appropriately-sized boundaries in existing communities, rural and urban.

Conduct a jobs-housing fit analysis to determine how well-matched job wage levels and affordability of housing units are within any jurisdiction or surrounding any significant job center. This analysis should guide the regional housing needs allocation and be used to inform zoning and other land use decisions. Establish a baseline against which to measure future improvements in the jobs-housing fit, which can be done using publicly available data.

Identify and map areas that are susceptible to gentrification due to transportation and infrastructure investments under the SCS. In those identified areas, incentivize strategies to mitigate displacement of existing residents and ensure opportunity for new residents of all income levels. For such areas, link transit and infrastructure funding to adoption of anti-displacement strategies and policies that encourage mixed-income home development at the jurisdiction level.

Preserve and develop affordable homes, not solely in urban cores, but also in established rural communities. According to the Concord Group Report, demand forecasts indicate a need for higher density homes in small communities. Incentivize infrastructure improvements needed to facilitate development or rehabilitation of homes (e.g. increased water treatment capacity, funding for basic infrastructure, development of rural investment zones), especially those affordable to rural workers, within an appropriately-sized growth boundary.

Limit SCS/RTP implementation funding to projects in areas with current, approved housing and land use elements, regardless of whether the entity funded is the local government, a non-profit, a transit agency or other funded entity – with the exception of projects that specifically serve low-income residents.

ie o create a healthier future for the San Joaquin Valley.

Land Conservation

Minimize loss and conversion of high-value farm, ranch, and natural resource lands

Map agricultural and other open lands with natural resource values, including but not limited to farmland, grazing land, riparian corridors, aquifer recharge areas, rare and important vegetation, critical wildlife habitat and corridors, vernal pools and other wetlands, and carbon sequestration capacity. Incorporate these resource maps into transportation planning and large-scale development proposals as a baseline for decision making.

Determine projected conversion of identified and mapped resources by urban and rural development (acres in each category) as reflected in existing land use plans and policies.

Establish goals and quantify benefits for avoiding conversion of these resources (acres in each category) based on increasing development efficiencies (measured by people, jobs and economic outcomes per acre), and identify policies for mitigating conversion that cannot be avoided.

Quantify the GHG reduction that would be achieved by meeting the SCS goals for reducing land conversion (over and above those associated with reduction in vehicle miles traveled) as well as the co-benefits of achieving those goals, including but not limited to water and energy conservation, public service cost containment, and increases in agricultural output and ecosystem services.

Assess and develop the ability of current local government policies to meet the SCS land conservation goals and, if necessary, propose policy changes and funding incentives necessary to achieve them.

Establish a system of benchmarks that local governments can use to track their progress in meeting the SCS goals for avoiding and mitigating the conversion of open lands.

How Councils of Governments can make the most of SB 375

Foster Meaningful Engagement: Reach out beyond elected officials and have a robust public participation process, including comments from a wide array of community stakeholders. Provide for the meaningful inclusion of residents of all incomes, races, ethnicities, languages, backgrounds, and parts of the county in the development and implementation of these plans by following best practices for public engagement.

Maximize Public Health Benefits: Use performance metrics that measure health, safety and social equity within the scenarios developed to inform the SCS. Measure air pollutants and associated health impacts, such as levels of daily physical activity via walking and biking, percentage of planning budget invested in active transportation, and other metrics to inform decision makers. Collect and disaggregate all metrics by race/ethnicity, income, geography, age, and disability.

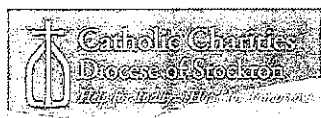
Forecast Progress on the Goals That Matter: Embrace a diverse group of stakeholders in working to identify goals. Set a wide range of health, economic, and conservation performance measures for evaluation. Use these to educate decision makers about the potential benefits of each planning scenario.

Develop an Ambitious Scenario That Meets or Exceeds the Valley's Greenhouse Gas Targets: Create a range of ambitious scenarios that go beyond existing plans and consider additional steps that could further advance the goals of cleaner air and a more healthy and equitable region. Carefully tailor transportation investments to the growth in each scenario. Select an ambitious scenario that meets or exceeds the targets of reducing per capita greenhouse gas emissions by 5% by 2020 and 10% by 2035, as compared to 2005. Choose long-lasting solutions that increase reductions over time.

Ensure that the Plan Benefits, Not Harms, Low-Income Communities of Color: In the plan's environmental justice analysis, identify places that are disadvantaged and seek to improve conditions there. Prioritize investment in areas identified by an environmental justice committee. Use both Census and travel survey data to ensure model results reflect conditions in environmental justice communities. Analyze how well each draft scenario improves regional equity before adopting a strong, equitable plan.



Sequoia Riverlands Trust
Conserving California's Heartland



CENTER ON RACE, POVERTY & THE ENVIRONMENT