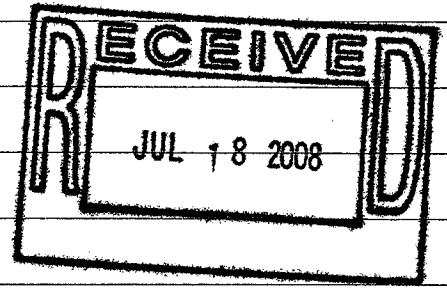


California Air Resources Board
1001 I Street, P.O. Box 2515
Sacramento, CA 95812



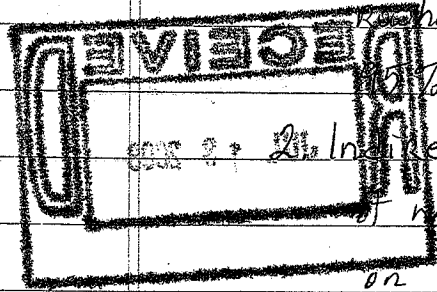
Dear Chuck Shuloch,

I am commenting on the California Air Resource Board's (CARB) AB32 scoping plan to reduce global warming pollution. The plan is weak in its approach to land use and development. We need more than a half hearted attempt to combat Global Warming. We need compact walkable development. It is important to concentrate 95% of future development into our existing cities as infill and within their urban development boundaries. If people live where they work and are able to walk, bicycle, or take public transit to work, school and shopping, we could greatly reduce Vehicle Miles Travelled. The combination of good regional and local land use planning would save farmland, reduce air pollution, decrease GHGs, encourage walking, and reduce public service costs.

It is unfortunate that the crisis of Global Climate Change is occurring at the same time the world supply of petroleum and natural gas is dwindling while demand is increasing. Petroleum and natural gas will become extremely expensive. We will need to cluster in small towns and grow food in fields around each town. Transportation of food and other products from a distance will be prohibitively expensive.

The AB32 plan CARB adopts needs:

1. high regional targets for fuel efficient land use. This



means compact communities of homes on very small lots, row houses, and mixed use development. We must direct

50% of all new growth into existing towns and cities.

2. Indirect Source Review to assess Global Warming pollution of new sources and charge those sources a fee based on expected emissions

3. A minimum average density of 20 people per acre for new development within urban development boundaries and hamlet development boundaries. This is possible and has been achieved in Eastern U.S. cities via row houses, mixed use, and houses on small lots.

4. Clean convenient public transit, supported ^{by} state infrastructure dollars.

5. Congestion pricing in grid-locked cities

6. High GHG reduction targets (like .75 million metric tons of Sacramento region plan)

Following are my comments on air quality in California in general and the San Joaquin Valley in particular.

I am fed up with our air quality. I wish we had never moved to the San Joaquin Valley. And I am very angry with the SJVACD for dragging its feet for so many years. I know the Central Valley is a bowl. I know there is an inversion layer. I also know we get pollution drift from the San Francisco Bay area. That does not excuse us from cleaning up every source of air pollution in the San Joaquin Valley. I do not want to hear about

all the progress we've made when we have a hell of a long way to go. We have an appallingly high rate of child asthma. PM10 can cause asthma and emphysema exacerbations, angina, and heart attacks.

My recommendations for cleaner air in the San Joaquin Valley and California are:

- ban all agricultural burning
- promote no-till agriculture or at least conservation tilling so fewer passes are made through fields. Each pass creates dust clouds behind the tractor and leaves soil loose and vulnerable to wind erosion (dust devils).
- ban open fireplaces in all new construction
- mandate the most efficient woodstoves in all new housing
- offer incentives to people to replace inefficient woodstoves with the highest EPA rated woodstoves
- ban leaf blower sales and the use of leaf blowers by "landscaping" businesses and local governments
- ban diesel irrigation pumps. Replace them with electric powered pumps
- place mandatory strict controls on emissions from concrete plants
- get gross polluting vehicles off the roads. Buy them and scrap them.
- ban incinerators
- mandate methane digesters at dairies, pig farms, and poultry factories
- lobby Sacramento for legislation to require all consumer goods

to be packaged in and manufactured of recyclable components so very little trash goes to landfills

- mandate all building materials and home products (like carpets, furniture, upholstery) have minimal outgassing of formaldehyde
- ban methyl bromide now
- strongly recommend Sierra Nevada counties restrict development in wildland-urban interface. - More homes in foothills and mountains means more wildfires and longer times to extinguish the fires because CALFIRE is required to save people first and property second before saving natural resources. So the wildfire gets the upper hand and creates more air pollution.
- promote and incentivize solar power on a large scale and domestically
- Reduce California ozone emission standards for power plants, chemical facilities, ^{and} refineries to 0.06 parts per million by 2015
- strongly oppose sprawl and New Towns
- promote city-centered growth and clean public transit
- regulate emissions of hydrogen sulfide from petroleum, confined livestock, paper and landfill operations
- monitor air quality daily, 24 hour monitoring for hydrocarbons, ozone, PM-2.5, PM-10, hydrogen sulfide, nitrous oxide
- regulate all stationary sources of air pollution, including diesel irrigation pumps and confined animal operations
- regulate air pollution emanating from all off road vehicles,

- including agriculture and construction vehicles
- enforce regulations on air emissions
- no more delays and waivers for agriculture
- conduct honest data analysis

Please post my comments on the web page minus my address.

Sincerely,

Carole A. Clam

cc Arnold Schwarzenegger, Governor of California
Seyed Sadredin, Executive Director/Air Pollution Control Officer
San Joaquin Valley Air Pollution Control District
Mary Nichols, Chairman, California Air Resources Board