



San Joaquin Valley Regional Policy Council

c/o Council of Fresno County Governments – 2035 Tulare St. #201-Fresno, CA 93721
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October 7, 2010

The Honorable Governor Arnold Schwarzenegger
State Capitol Building
Sacramento, CA 95814

**Re: San Joaquin Valley Air Pollution Control District Representation on
the Air Resources Board**

Dear Governor Schwarzenegger,

On behalf of the San Joaquin Valley Regional Policy Council, it is with great dismay and disappointment that I write this correspondence. As you are aware, and as mandated by SB 375 legislation, the California Air Resources Board (ARB) voted on September 23, 2010 to approve the greenhouse gas emission reduction targets for the eighteen Metropolitan Planning Organizations (MPOs) in the State. The approved placeholder targets for the San Joaquin Valley MPOs were a 5% reduction for 2020 and a 10% reduction for 2035. Upon the release and review of the placeholder targets in early August 2010, all eight of the San Joaquin Valley MPOs, and the San Joaquin Valley Air Pollution Control District expressed grave concerns that the targets for the San Joaquin Valley were overly ambitious and unachievable.

We here in the San Joaquin Valley are gravely concerned that in addition to the potentially high economic costs of such over-ambitious targets, a number of our stakeholders have expressed that communities in the Valley are very discouraged by such unattainable targets, and thus likely to disengage from the SB 375 process. As has been expressed and reiterated a number of times by the eight MPOs and the counties/and cities that we represent, unrealistic targets are also likely to have a very negative impact on implementation of the San Joaquin Valley Blueprint. From our MPO perspective, despite our ongoing expression of concern regarding the overly ambitious targets, establishment of the SB 375 GHG targets has turned out to be an entirely "top-down" process where every piece of technical data developed by San Joaquin Valley MPO modelers was ignored by both the ARB staff and the Board. The outcome of the GHG target setting process has validated for many, the original fear that despite the promise of a "bottom-up" approach by the State Legislature, in the end, the State will ignore the San Joaquin Valley and its concerns.

In an effort to address this concern and work with all of our San Joaquin Valley stakeholders, the San Joaquin Valley MPOs and the San Joaquin Valley Air Pollution Control District decided to jointly develop and request alternative placeholder targets, calling for a 2% reduction in 2010 and a 5% reduction in 2035. In a demonstration of support, the San Joaquin Air District Governing Board took an action on September 16th to support the alternative target placeholders. These revised targets were then discussed in detail with ARB staff on a conference call with all of the San Joaquin Valley MPO Directors on the afternoon of September 21st, before the ARB meeting on September 23rd. ARB staff expressed confidence on the call that the revised targets were likely to be viewed favorably by the ARB Board.

Unfortunately, the Air District's representative on the ARB Board failed to convey, either intentionally or unintentionally, the Air District Governing Board's action at the ARB Board meeting on September 23rd. In addition, the request from the eight San Joaquin Valley MPOs, through the Air District, went totally undiscussed by either ARB staff or the Policy Board at the meeting. Subsequently the ARB Board voted for the original staff recommendation of 5% reduction for 2020 and 10% for 2035 for the San Joaquin Valley MPOs.

Although it is my understanding that the District representative was not obligated to vote along the lines of the Air District Governing Board's action, it is very disturbing that the San Joaquin Valley's voice, as expressed by our elected officials, was not heard and our interest not represented at the September 23rd meeting of the ARB. The events that transpired at the meeting would likely lead anyone who was not familiar with the process to believe that the San Joaquin Valley had absolutely no concerns with the GHG placeholder targets as recommended by the ARB.

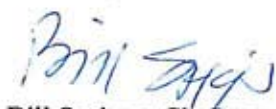
After much discussion and reflection on what happened at the September 23rd ARB Board meeting, the Valley feels strongly that an *elected official* from the San Joaquin Valley Air District Governing Board should be appointed to the ARB Board. As one of the areas with the worst pollution in the country, and one of the most economically disadvantaged areas in the State, it is critical that the Valley's interest be properly represented at the ARB Board. An elected official would serve such function well since he/she has to represent the constituents with the votes he/she casts. If not, he/she may potentially be removed by the local policy body from the Air District Governing Board, and thus the ARB Board as well. The built-in accountability with elected officials would at least ensure that the Valley's interest will come before personal preference.

Although the San Joaquin Valley was provided with the flexibility that the targets will be revisited in 2012 and finalized in 2014, the issue of San Joaquin Valley Air Pollution Control District representation on the ARB Board needs to be addressed promptly as the San Joaquin Valley can't afford to not be effectively represented on the critical issues that the ARB Board takes action on.

As the San Joaquin Valley ponders the next steps necessary following the September 23rd ARB Board action of setting unattainable greenhouse gas reduction targets for the Valley, and on behalf of the San Joaquin Valley Regional Policy Council, I am requesting your help in the development of corrective action with the San Joaquin Valley Air District's representation on the ARB Board. Your consideration and prompt action will be highly appreciated.

Should you have any questions, please feel free to contact Tony Boren, Executive Director, Council of Fresno County Governments at 559-233-4148 ext. 204 or tboren@fresnocog.org.

Sincerely,



Bill Spriggs, Chairman
San Joaquin Valley Regional Policy Council
Mayor, City of Merced