



February 21, 2008

Mary Nichols
Chairman
Air Resources Board
P.O. Box 2815
Sacramento CA 95812

Re: Comments on Goods Movement Emission Reduction Program

Dear Chair Nichols:

Fresno Chamber of Commerce is a non-profit organization concerned with business issues that relate to air quality in the San Joaquin Valley. The purpose of this letter is to add our voice to the many Valley-based organizations urging the Board to equitably distribute the Proposition 1B funding.

After reviewing the ARB's staff recommendations dated January 3, 2008 we offer the following observations on your staff's recommendations:

San Joaquin Valley air quality challenges are unmatched by any other regions in the state. The geography, topography and weather provide the perfect environment to create and trap air pollution. One pound of emissions in the San Joaquin Valley does a lot more damage than it would in any other region in the state. For instance, the Bay Area with 6 times more emissions per square mile has clean air and South Coast air quality is only marginally worse with 10 times more emissions per square mile.

Goods movement is the single largest source of emissions in the San Joaquin Valley. I-5 and SR-99 are the major north-south corridor for the movement of goods in the state. Out of the 4 goods movement corridors roughly 45% of all truck miles travelled and emissions occur in the San Joaquin Valley.

We were very encouraged, last year, when ARB and the Governor made a commitment to help the valley come into attainment of the federal ozone standard early by 2017. The current staff proposal ignores this commitment and the Valley's needs for ozone attainment. Governor Schwarzenegger expressed deep disappointment in the ozone attainment deadline stating; *"There are few environmental issues facing Californians that are more important to our children's health, our quality of life, and our economic security than air quality."*

After testimony regarding the District's 2007 Ozone Attainment Plan, ARB Chair Mary Nichols stated that 2017 was the appropriate attainment goal, regardless of what the legally approvable plan says, and that ARB would lend its weight to the



commitment to attain by 2017. This goal can become a reality through a fair distribution of Proposition 1B funds.

In summary, the Fresno Chamber of Commerce encourages the ARB to accept the changes recommended by the Valley air District and increase the allocation for the Central Valley to 37%.

- Use the officially sanctioned heavy-duty truck emissions inventories in calculating goods movement air quality mitigation funding allocations
- Consider the commitment by ARB and the Governor to accelerate attainment of the federal ozone standard to 2017 in the funding formula.
- Consider population exposure to emissions, rather than just a simple population weighting factor in the formula.
- ARB staff has indicated that the San Joaquin Valley will receive "co-benefit from the funding of trucks that service the ports, to ensure that this occurs 25% of the port truck funding should be dedicated to trucks that spend 50% of their time in the San Joaquin Valley.

Our Chamber membership is excited by the prospect of making the Goods Movement Emission Reduction Program a success as the Board considers the staff recommendation. The Valley's need is greater than what is reflected in your staff's work and we ask that our comments be considered by the Board. We look forward to continued collaboration with ARB and the District and thank you for weighing our comments in your deliberations.

Sincerely,

Al Smith,
President and CEO,
Greater Fresno Area Chamber of Commerce

CC: Mayor Autry, Fresno
Councilmember President Blong Xiong
Councilmember Henry T. Perea
Councilmember Brian Calhoun
Councilmember Mike Dages
Councilmember Jerry Duncan
Councilmember Cynthia Sterling
Councilmember Larry Westerlund
Supervisor Connie Conway, California Partnership for the San Joaquin Valley
Peter Weber, California Partnership for the San Joaquin Valley
Ms. Cynthia Marvin, ARB
Mr. Douglas Ito, ARB

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