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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

April 18, 2006

Dr. Robert F. Sawyer, Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

STAR THE AIR 50 1955-2005 FOR A HEALTHIER FUTURE

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Re: Proposed Comprehensive Emission Reduction Plan for Ports and Goods Movement

Dear Chairman Sawyer:

Bay Area Air Quality Management District staff urge the Air Resources Board to adopt the proposed comprehensive plan for reducing emissions from diesel engines used in transporting freight and materials to, from and at the maritime ports and airports in California. We agree with ARB staff that the proposed plan provides an excellent framework for developing an economically vibrant and clean freight transportation system. The Bay Area Air District is exploring a collaborative regional process to implement measures outlined in the proposed plan to reduce emissions from moving goods in the Bay Area.

The expected tripling of freight moving through local seaports and airports, over highways, rail networks and state waters emphasizes the need for aggressive control of the diesel equipment that moves cargo – the trucks, trains, off-road equipment and ocean going vessels. A recent health risk assessment of operations at the Ports of Los Angeles and Long Beach conducted by ARB staff, and cited in the proposed plan, identified the very high cancer risk levels for local residents. We believe that residents in the Bay Area who live and work adjacent to maritime ports, airports and rail yards are also exposed to health risks from diesel emissions.

The inclusion of emissions from all sea and land freight movement – domestic and international – is a particularly important improvement in the final proposed plan, and we applaud ARB staff for responding in a positive manner to the comments provided during the public review process. We hope that there will be a similar broad scope in the *Statewide Goods Movement Action Plan* currently under development by the Department of Business, Housing, and Transportation and the California Environmental Protection Agency.

The proposed plan would be improved with a more extensive consideration of the impacts from air freight emissions. While some of these emissions impacts would

(22)

be addressed through the control strategies proposed for trucks and off-road equipment, the plan does not propose any strategies for reducing, or at least halting or slowing the growth of, aircraft emissions. We acknowledge that direct control of airplane engine emissions is difficult both technically and politically; however, so is the control of emissions from large ocean-going vessels and yet the proposed plan contains a number of strategies to lower ship emissions that would readily apply to airplane emissions. These include greater use of the cleanest airplanes on California routes, expanded use of terminal power while planes are at passenger and freight terminals, and incentives for the installation of jet engines with emissions below international standards.

An additional strategy that would indirectly decrease the rate of growth in airplane emissions is the full development of the California High Speed Rail system, as approved by the California High Speed Rail Authority in November 2005. The environmental documentation for the high speed rail system clearly showed the strong potential for a shift in travel from airplanes to rail if the high speed rail system were developed. This could decrease passenger airplane flights, which in turn could make room for the projected growth in air freight without an overall increase in total airplane emissions. We urge the Board to direct staff to add a consideration of the benefits from high speed rail service to a future update to the proposed goods movement emission reduction plan.

In addition, we urge the Board to consider the addition of rail electrification as part of the intermediate and long-term strategies for reducing locomotive emissions. At a minimum this consideration should focus on the benefits from the electrification of the passenger rail lines, such as those used by Amtrak California and Caltrain, and any newly initiated short-haul service between the Central Valley and the Port of Oakland. The proposed new rail freight services to the Central Valley will likely share tracks with passenger services and joint development of electric propulsion would improve the overall cost-effectiveness of this strategy.

As noted in the proposed plan, diesel trucks are the single largest source of freight-related emissions, with the overwhelming amount of truck emissions being related to the hauling of domestic freight. Fortunately, the many already adopted and forthcoming ARB regulations will result in a steep decline in truck emissions over the next 10 to 15 years. Because of this, the proposed plan correctly focuses on strategies to accelerate the benefits of new engine standards and retrofit technologies. We urge the Board, however, to not limit monetary incentive strategies to trucks servicing maritime ports; funding for truck replacements should be available to all truck owners operating within California. Additionally, we strongly encourage that governmental subsidies not exceed 50% of the cost for a cleaner engine or truck. User fees on companies either shipping or receiving goods, or other market incentives, should represent the balance of any subsidies.

We compliment ARB staff for acknowledging the importance of land-use strategies and the application of advanced technologies to help avoid impacts from freight emissions by

establishing buffer zones or by making freight movements more efficient. These strategies have not yet been widely implemented and their benefits are currently hard to quantify. The Metropolitan Transportation Commission and the Port of Oakland are currently working with key partners to develop land-use policies, and demonstration projects for "smart corridors" and other information systems that should help improve our understanding of these strategies. Results from these demonstrations can be incorporated into an update to ARB's comprehensive emission reduction plan.

Lastly, the Bay Area Air District will be working with regional and local partners to address air quality impacts from goods movement in the Bay Area, especially at the Port of Oakland. Affected communities will be an integral part of the process. We invite ARB to partner with us in this effort.

Thank you for your consideration of our comments. Please contact me if you would like to discuss our comments in further detail.

Sincerely,

Jack P. Broadbent

Jack P. Broadbent
Executive Officer/APCO

cc: Sunne Wright McPeak, Secretary of Business, Transportation, and Housing
Cynthia Tuck, Assistant Secretary for Policy, CalEPA
Supervisor Mark DeSaulnier
Steve Heminger, Metropolitan Transportation Commission