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CALIFORNIA AIR POLLUTION CONTROL OFFICER'S ASSOCIATION

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April 14, 2006

Clerk of the Board
California Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

RE: Comments Regarding CARB's Emission Reduction Plan for Ports and Goods Movement in California

The California Air Pollution Control Officers Association (CAPCOA) appreciates the opportunity to submit comments regarding the *Emission Reduction Plan for Ports and Goods Movement in California* (plan), released by the California Air Resources Board (ARB) for public review on March 21, 2006.

CAPCOA is supportive of CARB's efforts to develop a comprehensive plan to reduce the impacts from goods movement. We are also pleased to see the numerous improvements to the plan since the December 1, 2006 draft. The goods movement transportation system is the major source of diesel emissions and related health risks in the state. CARB has devoted significant resources to develop a plan that goes a long way towards reducing the impacts from this sector.

CAPCOA has the following comments for CARB consideration at the April 20 hearing:

Emission reduction goals. We believe the goal to achieve 2001 emission levels in 2010 should be applied to each sector individually. Emissions under the base case will decline by 2010 from 2001 levels without implementation of the plan. This is due to emission reduction strategies already adopted, notably those for on-road heavy duty trucks. The plan's goals should reflect implementation of all controls that can be feasibly implemented—not just those that have already been adopted. In this way the public will in the future be able to compare actual progress under the plan against realistic measures of what can and must be done to clean our air. We also suggest that the goals for the plan be amended to conform to the projected emissions levels that will result from plan implementation. In addition, in order to maintain pressure for reduction of emissions from all source categories, the plan should state a goal of achieving, at a minimum, 2001 level emissions by 2010 from each source category—unless it clearly can be concluded at this time that such a goal would be impossible to achieve.

Plan Implementation. Approval of this plan must be followed by expeditious dev elopement of an implementation plan that specifies adoption of emission control measures by state, regional and local governments to the maximum extent of their authority in order to meet the clean air needs of this state.

Public and Local Agency Involvement. As part of implementing this plan, the state needs to work closely with local governments and air quality districts, and actively solicit input from the public.

Air District Comments. Individual air districts will provide additional comments and make specific suggestions regarding issues of particular interest in their jurisdictions.

Thank you again for the opportunity to provide these comments. We offer our support for CARB's upcoming efforts to implement this plan, and for continuing efforts to refine and augment control strategies for goods movement sources to achieve healthful air quality as quickly as possible.

Sincerely,

Barbara A. Lee
President, CAPCOA

cc: Catherine Witherspoon, ARB Executive Officer