

**NATURAL RESOURCES DEFENSE COUNCIL
AMERICAN LUNG ASSOCIATION OF CALIFORNIA
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES
COALITION FOR CLEAN AIR
COALITION FOR A SAFE ENVIRONMENT
COMMUNITIES FOR CLEAN PORTS
COMMUNITY ACTION TO FIGHT ASTHMA
EARTH DAY LOS ANGELES
ENVIRONMENTAL HEALTH COALITION
FRESNO METRO MINISTRY
GRAYSON NEIGHBORHOOD COUNCIL
GREEN LA PORT WORK GROUP
HEALTHY SAN LEANDRO ENVIRONMENTAL COLLABORATIVE
LONG BEACH ALLIANCE FOR CHILDREN WITH ASTHMA
MOMS CLEAN AIR NETWORK
PHYSICIANS FOR SOCIAL RESPONSIBILITY—LOS ANGELES
PLANNING AND CONSERVATION LEAGUE
REGIONAL ASTHMA MANAGEMENT AND PREVENTION INITIATIVE
SIERRA CLUB CALIFORNIA
UNION OF CONCERNED SCIENTISTS**

February 26, 2008

Chairwoman Nichols and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**Re: Strong Support for Proposition 1B Goods Movement Emissions Reduction
Guidelines for Implementation**

Dear Chairwoman Nichols and Members of the Board:

On behalf of the undersigned organizations, we submit comments on the Proposition 1B Goods Movement Emissions Reduction Program (“Prop 1B GMERP”). This proposal represents a strong program to ensure positive benefits from the \$1 billion for air quality mitigation in California’s trade corridors. As the author of the Emission Reduction Plan for Ports and Goods Movement in California, this Board is well aware that the goods movement industry is exacting a large toll on residents throughout the state through health impacts associated with the thousands of diesel engines that move goods throughout the state. These impacts affect all Californians, but especially those communities living adjacent to ports, distribution centers, freeways, truck stops and railyards. Moving forward, we remind this Board that it is of the utmost importance that these funds be distributed to reduce pollution in a manner that provides the greatest benefit to those most impacted by the transport of freight. For this reason, we are pleased to support the program that the staff is asking the Board to adopt at the February Board Hearing. Below, we

provide some specific comments on the positive attributes of the program and room for improvement.

Positive Attributes of the Program

- One of the greatest attributes of this program is the rigorous requirements for local agencies and equipment operators to ensure wise use of these public funds. This accountability in the expenditure of this unique infusion of funds is of paramount importance and should be present throughout the life of this program.
- We are also pleased that the proposal ensures that “transportation infrastructure projects [are] not eligible to compete for this funding since there are other Proposition 1B and federal/State programs available for this purpose.”¹ Throughout this process, entities have been looking to raid these funds for transportation projects that are best suited being funded through other pots of money. However, the suite of mitigation projects laid out by this proposal truly reflects the intent of the bond legislature in focusing on cleaning up the equipment that moves goods throughout California.
- We are also pleased that CARB is pro-rating grant funding to truck drivers that cannot commit to a full 4 or 8 years of driving in California. We suggest that a back-end pro-rating may also be needed, so that if market conditions change and a driver is unable to continue operating in California for the full term of 4 or 8 years, he can re-pay a pro-rated portion of the funding.
- We also support CARB’s insistence that reductions under this program are not available for emissions reduction credits.
- We also support CARB’s continued examination of low-interest loan programs.
- We also support the improvements to the Guidelines that relate to truck efficiency and outreach to independent drivers.

Needed Improvements for the Program

Even with the multitude of positive attributes of this program, there are several improvements that could be made to enhance the public health benefits of this program. The following represent our major concerns and suggestions for rectifying these concerns:

- Stationary air pollution control equipment at intermodal maintenance facilities (e.g. Advanced Locomotive Emissions Control Systems—otherwise known as hood technology) should be eligible for funding under Prop 1B GMERP when available. Communities adjacent to railyards are exposed to exceptionally high levels of emissions, and it is our understanding that these types of technologies could be useful in mitigating that exposure.
- We are pleased with many of the improvements that have been made to the public process piece of this program, and we appreciate the effort CARB staff has made to reach

¹ Proposition 1B: Goods Movement Emission Reduction Program Staff Report on Proposed Guidelines for Implementation, at 5 (Jan. 3, 2008).

out to many stakeholders. At the same time, the public process component of this program could be enhanced by the following two improvements:

- CARB needs to provide more guidance on the community meetings by local agencies to solicit input on projects, including guidance on noticing the meeting electronically and by paper to interested members of the community, providing a minimum of 14 days advance notice of the community meeting in the first year of funding and 20 days notice in subsequent years, and providing multilingual services when appropriate.
 - As we have articulated previously, community participation in Proposition 1B implementation should be formalized by establishing Community Advisory Groups comprised of residents impacted by freight transport. These advisory groups would be convened by the local air districts for their respective trade corridors and would help CARB prioritize the list of possible projects and help monitor projects as they move forward. The advisory groups should be slated to present their observations on bond-funded projects to the CARB board during the update recommended above. In order to provide enough time for the advisory groups to thoroughly review the applications for Prop 1B grants it is essential that the advisory groups be convened directly following the adoption of guidelines by CARB.
- The Guidelines should specify that funds allocated to distributed generation could also fund solar panel infrastructure.
 - In upcoming guideline revisions, CARB should reexamine the 100% California operation requirement and 150 trip minimum for port trucks.

We appreciate all of the hard work that staff has put forward in crafting this program, and we appreciate your consideration of our comments. We urge the Board to move forward with these critically needed funding programs as quickly as possible. Please do not hesitate to contact us if you have any further questions.

Sincerely,



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On Behalf of:

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