

Public Comments to the California Air Resources Board  
Regarding the Regional Allocation of Proposition 1B Funds for Reducing Goods  
Movement Emissions

My name is Dr. David Lighthall and I am Senior Scientist for Environmental Health at the Central Valley Health Policy Institute at CSU, Fresno. You face a very difficult task in deciding how to allocate these limited funds—the need clearly far the level of funding provided by the bond funds. Given the scarcity of resources, I would like to put forward several empirical arguments for increasing the San Joaquin Valley's share of the Proposition 1B mitigation funding.

1. First, there is no question both the San Joaquin Valley and the South Coast air basins face a very difficult attainment challenge for ozone and PM 2.5.
  - a. The Prop 1B funds represent only a down payment on this investment. Each region is facing billions of public and private sector investment over the next decade and beyond.
2. Placed in this context, I want to emphasize two main points:
  - a. First, the San Joaquin Valley's ozone and PM 2.5 attainment problem is much more directly tied to goods movement emissions from heavy heavy duty trucks (trucks) when compared to the South Coast.
  - b. Second, the San Joaquin Valley has a significantly lower capacity to raise additional mitigation funds and therefore faces a proportionally greater risk of non-attainment.
3. Regarding the first point, Figure 1 demonstrates a clear regional contrast in the contribution of trucks to the Valley's ozone problem:
  - a. One out of every two tons of mobile source NO<sub>x</sub> in the San Joaquin comes from trucks.
  - b. Only one out of every five tons of mobile source NO<sub>x</sub> in the South Coast comes from trucks, with a much greater contribution from sources that are not subject to Proposition 1B funding.
  - c. In Figure 2 you can see that a similar situation exists with PM 2.5.
4. Now I would like to address the second, more complex point—that the South Coast is more capable of generating the additional funds beyond Prop 1B that will be necessary for ozone and PM 2.5 attainment.
  - a. Using borrowed funds as in the case of Proposition 1B is an incomplete, expensive, and unsustainable policy tool for air pollution mitigation.
5. More efficient and equitable policy mechanisms for generating mitigation funds must reflect the structural nature of the goods movement problem:
  - a. The negative health effects of goods movement pollution create significant human and economic costs that are currently not included in transportation costs and consumer prices.

- b. Given this problem of external health costs, the ideal policy model is one that forces wholesalers, retailers, and consumers to pay a slightly higher price for their goods through the imposition of pollution fees in the goods movement system.
    - i. On a dollar for dollar basis, these fees can be quite modest and would be virtually invisible to consumers.
    - ii. But collectively they are capable of generating a substantial and sustainable source of mitigation funding that could, should, and, I hope, will serve as the primary means of accelerating attainment and reducing the tragic public health impacts of air pollution.
  - c. Under current U.S. law, air basins with major port authorities have a significant advantage over the San Joaquin Valley when it comes to generating fees for mitigation programs.
    - i. Through their demonstrated legal authority, port authorities can and are imposing fees related to the use of their facilities.
    - ii. In contrast, the Valley District, the Air Resources Board and the California Partnership for the San Joaquin Valley have all explored ways of collecting air quality mitigation fees from trucks and have been unable to find a mechanism that is not impeded by interstate commerce law.
  - d. As a result, the Valley will depend on a second, less equitable and effective policy tool—the imposition of higher vehicle registration fees.
    - i. Unfortunately this policy model does not have an integral connection to the shipping and purchase of goods, and can only generate a small fraction of the funds necessary for accelerated attainment.
    - ii. Yet here again, the South Coast has a significant advantage over the San Joaquin Valley: Its population of over 17 million will enable it to raise far more funds when compared to the 3.7 million who reside in the San Joaquin Valley.
    - iii. And, as shown in Figures 1 and 2, in absolute terms the Valley's truck emissions actually exceed those of the South Coast.
6. In conclusion, I want to acknowledge out of respect for the ARB staff that my core argument—the contrasting regional capacity to pay for the full cost of goods movement mitigation—was not an explicit criterion in their preparation of the staff report. But I do hope that you take this important principle into consideration in your final deliberations. Thank you.

08-2-7  
David Lighthall

Figure 2: Contribution of Heavy Heavy Duty Truck Emissions to Mobile Source PM 2.5

South Coast and San Joaquin Valley Air Basins

(Source: CARB 2006 Inventory)

(Submitted by David Lighthall, Ph.D.; Central Valley Health Policy Institute, CSU-Fresno)

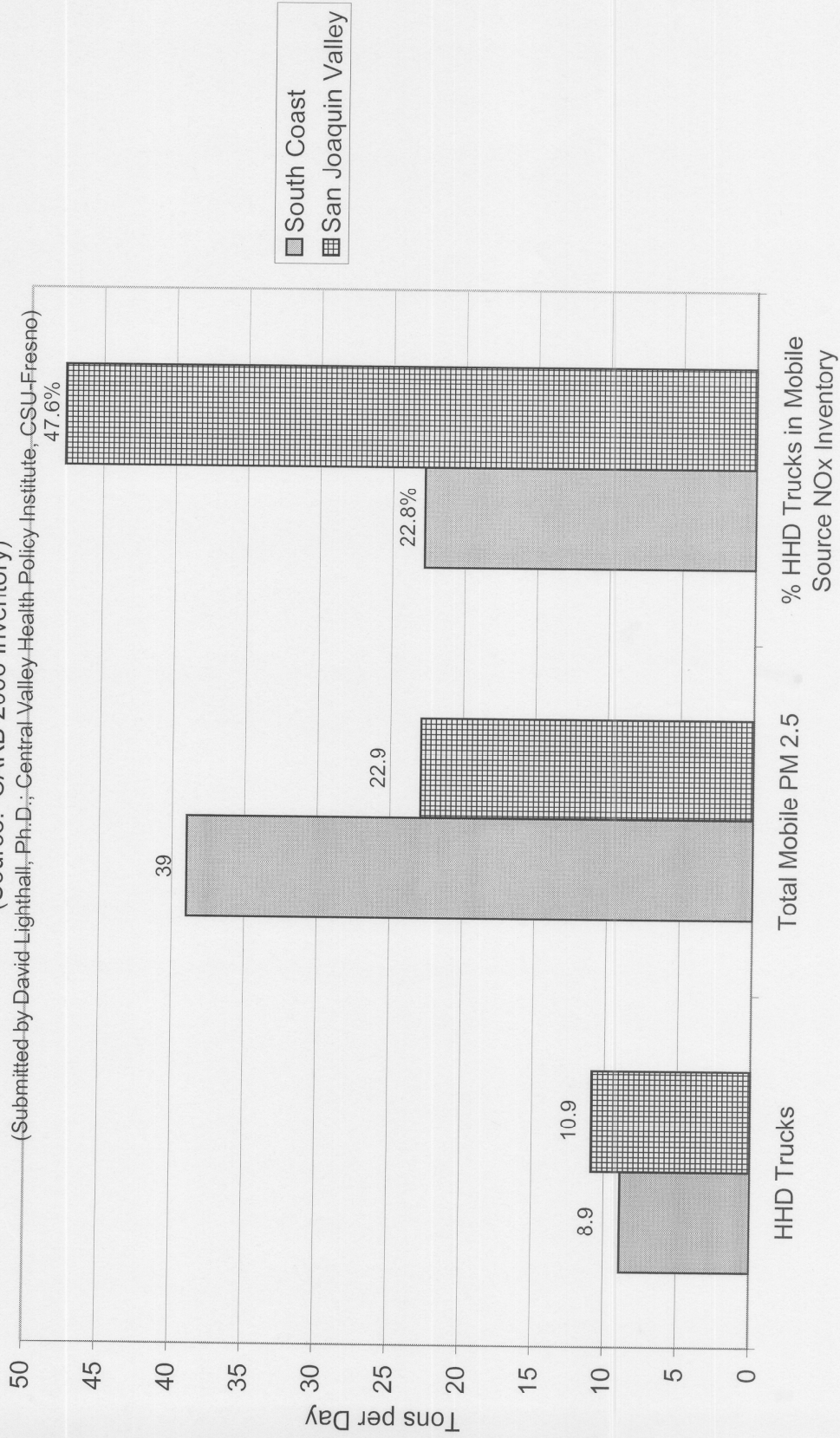


Figure 1: Contribution of Heavy Heavy Duty Truck Emissions to Mobile Source NOx  
South Coast and San Joaquin Valley Air Basins

(Source: CARB 2006 Inventory)

(Submitted by David Lighthall, Ph.D.; Central Valley Health Policy Institute, CSU-Fresno)

