



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

April 17, 2009

Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

**RE: COMMENTS ON PROPOSED AB 118 AIR QUALITY
IMPROVEMENT PROGRAM FUNDING PLAN FOR FISCAL YEAR
2009-10**

ALAMEDA COUNTY
Tom Bates
(Secretary)
Scott Haggerty
Jennifer Hosterman
Nate Milley

CONTRA COSTA COUNTY
John Gloia
Mark Ross
Michael Shimansky
Gayle B. Uilkema

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht
(Vice-Chairperson)

SAN FRANCISCO COUNTY
Chris Daly
Eric Mar
Gavin Newsom

SAN MATEO COUNTY
Carol Klatt
Carol Groom

SANTA CLARA COUNTY
Susan Garner
Yoriko Kishimoto
Liz Kniss
Ken Yeager

SOLANO COUNTY
James Spering

SONOMA COUNTY
Shirlee Zane
Pamela Torliatt
(Chairperson)

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Mr. Goldstene,

Thank you for the opportunity to provide comments on the proposed AB 118 Air Quality Improvement Program (AQIP) Funding Plan for Fiscal Year 2009-10. In general, the Bay Area Air Quality Management District (BAAQMD) strongly supports ARB's efforts to provide funding through AB 118 to accelerate the deployment of technologies and programs that accelerate air quality improvements throughout the state. However, there are two particular issues in the proposed Funding Plan that the BAAQMD believes will keep the program from achieving the overall goals of the originating legislature. These are as follows:

(1) ARB's definition of ... "an area where the greatest air quality impact can be identified" ... may be too narrow. Based on the BAAQMD's review of the proposed Funding Plan, it seems that the ARB's focus is decidedly on areas in nonattainment of the federal ambient air standards for criteria pollutants. While the BAAQMD applauds the goal of improving air quality in these areas, air quality should be judged not only by an area's attainment status but also on the extent that that air quality affects public health. Specifically, the Bay Area is home to approximately 22% of California's population and a number of those citizens are exposed to highly toxic diesel particulate emissions (especially in impacted community such as West Oakland). It is important that highly impacted areas like these are also addressed in the Funding Plan by targeting at least some of the funding to address diesel toxics as well as criteria pollutants. We request that the Funding Plan be amended to address Bay Area communities and communities throughout the State impacted by toxic air contaminants.

(2) Local air districts are better equipped to administer incentive programs that achieve AB 118's goals. ARB's current planning for the FY 09/10 AQIP requires that the bulk of funding be distributed through third-party vendors or competitive processes that limit local air district participation. ARB staff has argued that this will make participation easier and that this will get advanced emissions reduction technologies into the field earlier.

However, the BAAQMD feels that without those technologies operating in areas where they can be most effective (such as highly impacted communities) and without thought to sustainable infrastructure, these technologies may actually be harmed by ARB's current planning. BAAQMD proposes that, especially for the hybrid truck and bus program, that those funds be distributed through local air districts. This approach would provide air districts with the ability to seek further funding from federal incentive programs, the California Energy Commissions (CEC) portion of AB 118 and local transportation commission funds to support the infrastructure for these projects.

We at the BAAQMD appreciate all the hard work that ARB staff has done on the development of these programs. I believe that these programs will represent a valuable contribution to the improvement of air quality statewide. Additionally, I feel that by considering and incorporating the concerns the BAAQMD has raised here, these programs can have an even greater chance of success. My staff and I look forward to working with ARB in the successful implementation of the program.

Sincerely,

Jack P. Broadbent
Executive Officer/APCO

cc: Clerk of the Boards, California Air Resources Board