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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

July 18, 2016

Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Mr. Corey,

Thank you for the opportunity to comment on the *Proposed 2016 State Strategy for the State Implementation Plan* (SIP Strategy). The strategy contains measures to assist the San Joaquin Valley and the South Coast Air Basins in meeting the current federal ambient standards for ozone and particulate matter. But as noted, the SIP Strategy will benefit all of California, as it sets a solid foundation for meeting the State's ambient standards and future federal ozone standards, and points us in the right direction for meeting greenhouse gas (GHG) reductions. Many of the measures identified in the SIP Strategy are at the core of the Bay Area Air Quality Management District's (Air District) forthcoming triennial update to the Clean Air Plan and our initial Regional Climate Protection Strategy. The implementation of the SIP Strategy will also help in further reducing exposure to toxic air contaminants within heavily impacted communities, especially those along freeways and rail corridors. We support the programs outlined in the SIP Strategy and stand ready to work with ARB to implement them in the Bay Area.

Through a combination of regulatory and programmatic actions over the next fifteen years, the SIP Strategy will:

- Reduce emissions from consumer products;
- Establish more stringent engine performance standards for cleaner combustion technologies and increase the penetration of zero-emission technologies across a range of applications;
- Extend current and establish new incentives for the turnover of equipment and fleets to the cleanest technologies;
- Demonstrate new technologies; and
- Increase system efficiencies.

We are encouraged in particular with the proposals to further reduce reactive organic gases from consumer products; new and modified regulations that will increase penetration of zero emission technologies within vehicle and non-road fleets; expanded requirements for ocean going vessels to reduce emissions while at berth – with inclusion of other vessel types in the requirements being particularly important in the Bay Area, where 48% of ship traffic is currently not regulated; and the call for

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federal action to further control emissions from locomotives and international action to control emissions from ocean going vessels.

We support the early deployment of vehicles and equipment with zero-emissions. However, as zero-emissions technology becomes more commercially available we recommend that the critically needed future funding be administered through existing incentive programs, and that the incentive programs maintain regional equity. The existing strong collaboration between ARB and local air districts has created a proven track record in efficiently deploying commercially available zero-emission technologies, as well as managing projects developing advanced technologies. Maintaining this strong partnership will maximize GHG, criteria pollutant, and air toxic emission reductions.

The transition of the on-road fleet to zero and near-zero technologies is critical to achieving the State's public health, air quality, environmental justice, and GHG reduction goals. Continued funding is needed for the following reasons:

- Emissions reductions are needed from California freight movement to address health, air quality and equity disparities throughout the State;
- Up to 90% of mobile source emissions need to be reduced to achieve local air quality goals, particularly in the State's two Extreme non-attainment regions;
- A critical source of funding for cleaning up California's on-road trucks is going away; and,
- All parts of the State would benefit from investment cleaning up the on-road trucking fleet.

It is clear in the proposed plan that the successful penetration of zero and near zero emissions control technologies for light, medium and heavy duty on- and off-road applications will require significant capital. The Air District is concerned that all available sources of funds in the state will need to be directed to South Coast and SJV in order to incentivize the fleet turnover required to achieve the necessary NOX and PM reductions. This will take away important resources for the Bay Area and other regions that need to continue to reduce impacts from local toxic air contaminants and PM exposure, and to make progress toward state and federal ambient air quality standards. Also, based on the Air District's review of the strategies to be deployed for just the South Coast and SJV, the monetary resource need is extreme. Therefore, the Air District strongly supports seeking additional resources from the federal government to assist with the equipment replacements required by the proposed plan.

With regard to implementing the strategies themselves, the Air District believes they represent some significant administration challenges if the monies necessary to implement them are secured:

- *For example:* Relative to the heavy duty truck strategy, the Air District believes ARB should learn from our relatively recent collective experience with the I-Bond funding and drayage trucks. We jointly set out to replace or retrofit port trucks ahead of the drayage truck

compliance deadlines. This was a relatively small population of trucks but the project still required a significant effort due to the need to work with independent truckers and small trucking firms. The project involved herculean efforts by both ARB and the Air District and the compliance deadline had to be moved back several times. As the Air District reviewed the proposed strategy, and its associated measures (including the Incentive Funding measure) it calls for the replacement of unprecedented numbers of trucks within a very short timeframe. Certainly the Air District stand ready to assist in this effort but we believe that current grant programs will need to be restructured significantly in order to effectively get so many trucks changed out in time.

The Air District would also point out that the theme of aggressive fleet turnover goals runs through the proposed strategy. This means that not only will we have to successfully change out thousands of vehicles across the light duty, heavy-duty and off-road sectors in order to achieve our air quality goals but also we will most likely have to attempt to do this across all of these project categories at the same time. As previously mentioned, this will represent a significant logistics issue for our agencies.

The Air District also recommends that CARB and the California Air Pollution Control Officers Association open up a dialogue with USEPA on how the SIP credit process for emissions reductions associated with our incentive programs can be streamlined. USEPA has taken some steps in that direction by creating mechanisms to achieve SIP credit from our Moyer and other projects. However, the Air District believes that their process needs further streamlining to become more efficient and effective.

The SIP Strategy also makes reference to active transportation, but we encourage ARB to elevate emphasis on bicycling and walking. Specifically, ARB can revise the Vision model to better handle scenarios that prioritize reduction in vehicular travel, provide additional guidance to the Metropolitan Planning Organizations on increasing the role of active transportation in the Sustainable Communities Strategies, and work with local air districts and other partners to develop additional funding for active transportation projects. Additionally, the California Department of Transportation is developing a statewide plan for bicycles and pedestrians. This creates an opportunity for ARB to extend its commendable partnership with its sister State agencies for Sustainable Freight into other important transportation issues – fewer cars driving fewer miles will make the transition to a zero emission fleet easier.

We look forward to working with ARB in continuing our joint efforts to realize healthy air through sensible regulations and timely incentives. Statewide regulation coupled with local implementation continues to be a proven method for achieving our joint goals.

Sincerely,

A handwritten signature in black ink that reads "Jack P. Broadbent". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

JPB:DB:mm

cc: BAAQMD Board of Directors
Wayne Nastri, Acting Executive Officer, South Coast Air Quality Management District
Seyed Sadredin, Executive Director, San Joaquin Valley Unified Air Pollution Control District
Richard Stedman, President, California Air Pollution Control Officers Association
Steve Heminger, Executive Director, Metropolitan Transportation Commission