

**AMERICAN LUNG ASSOCIATION IN CALIFORNIA  
BAY AREA HEALTHY 880 COMMUNITIES  
CATHOLIC CHARITIES, DIOCESE OF STOCKTON  
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES  
COALITION FOR A SAFE ENVIRONMENT  
COALITION FOR CLEAN AIR  
COMITE CIVICO DEL VALLE  
COMMUNITY HEALTH COUNCILS  
EAST YARD COMMUNITIES FOR ENVIRONMENTAL JUSTICE  
ENVIRONMENTAL HEALTH COALITION  
GLOBAL COMMUNITY MONITOR  
GREEN EDUCATION INC.  
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MEDICAL ADVOCATES FOR HEALTHY AIR AND CENTRAL CALIFORNIA  
ASTHMA COLLABORATIVE  
NATURAL RESOURCES DEFENSE COUNCIL  
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PUBLIC ADVOCATES INC.  
REGIONAL ASTHMA MANAGEMENT & PREVENTION (RAMP)  
SIERRA CLUB CALIFORNIA  
UNION OF CONCERNED SCIENTISTS  
VALLEY IMPROVEMENT PROJECTS**

June 22, 2015

Chair Nichols and Members of the Board  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

RE: Cleaner Freight and Heavy-Duty Vehicle Investments in the Proposed FY2015-16 Funding Plan for Low Carbon Transportation Investments and the Air Quality Improvement Program

Dear Chair Nichols and Members of the Board:

The undersigned members of the California Cleaner Freight Coalition and the SB535 Coalition, representing public health, science, environmental, sustainable technology, and environmental justice organizations, strongly support directing funds from the Greenhouse Gas Reduction Fund and the Air Quality Improvement Program to projects that will reduce emissions from heavy-duty trucks, buses, and other freight-related and off-road equipment. These sources of pollution, primarily diesel-powered, represent a major source of air pollution in California and adversely impact the health of many communities throughout the state. The Air Resources Board has identified the freight sector as responsible for 45% of Nitrogen Oxide emissions, half of diesel particulate matter emissions, and a

growing source of global warming emissions. The impact on public health is staggering with an estimated 2,200 premature deaths occurring each year from freight-related emissions at an economic cost of \$20 billion per year. The health and environmental burdens of freight transportation are not shared equally, with the communities closest to these emission sources bearing the brunt of these impacts.

Please consider our comments below to increase the benefits of the proposed FY15-16 investments to the most heavily impacted communities.

We strongly support the investment of the proposed \$167 million in the freight, off-road and heavy-duty vehicle sector to advance new technology development and deploy lower-emission trucks, buses, and other equipment. This represents an increase of more than \$70 million compared to last fiscal year. This increased level of investment is important for accelerating the transformation to a cleaner freight system in California to improve public health, meet air quality standards, and reduce climate change emissions and oil use.

Because of the disproportionate impact to communities near rail yards, warehousing, freeways, ports, logistics centers, and border crossing, it must be a priority to target incentive funding to projects directly in these communities and to projects that provide benefits to these communities. The funding proposal indicates various levels of investment by project category will be targeted to projects directly in disadvantaged communities or providing benefits to disadvantaged communities. We believe a larger fraction of funding should be targeted to benefit these communities than is currently proposed.

The proposed funding plan specifies that at least 50% of the total \$65 million allocated for Zero-Emission Truck and Bus Pilot Commercial Deployment projects would need to either be located in or provide benefits to disadvantaged communities. While total funding for this category in the FY14-15 funding plan was \$25 million, 100% of the funding was directed to benefit disadvantaged communities.

We recognize the importance of providing flexibility to fund a variety of projects to accelerate the deployment of zero-emission truck and bus technologies, but believe a higher requirement to deliver benefits to disadvantaged communities should be included in the funding plan since those communities suffer the greatest impacts of heavy-duty diesel exhaust and have the fewest resources with which to mitigate its impacts.

***Proposal: We request that ARB target 75% of Zero-Emission Truck and Bus Pilot Commercial Deployment project funding to be spent on projects that deliver benefits to disadvantaged communities compared to the 50% proposed. Within the specific categories, 50% of bus funding should go to projects directly in disadvantaged communities, with an additional 25% benefitting those communities, and 25% of truck funding should go to projects directly in disadvantaged communities, with an additional 50% benefitting those communities.***

To ensure the benefits of these projects are indeed accrued in disadvantaged communities, we support ARB's proposed requirements for the use of telematics devices to track vehicle operation as part of the HVIP and Truck and Bus Commercial Pilot projects.

More generally, ARB must ensure that all Low Carbon Transportation investments avoid creating additional burdens in disadvantaged communities. For example, investments must avoid burdens such as increased traffic, increased exposure to traffic pollutants, or displacement of low-income residents or local community-serving businesses. Low Carbon Transportation funding must be used strategically to reduce freight impacts in disadvantaged communities without introducing new impacts. Projects such as siting of new transit or intermodal facilities adjacent to or within disadvantaged communities may have unintended consequences of increasing freight traffic volumes within communities or displacement of residents. The potential for creation of substantial burdens must be considered in the process of awarding GGRF funding.

Finally, zero-emission technologies are critical for the long-term health of our communities and meeting air quality and climate goals, and we support ARB's program focus on bringing these technologies to market and incentivizing early deployment. It is important that these technologies are deployed across various sectors and vehicle sizes and classes from delivery trucks and transit buses, to school buses and drayage trucks. We support ARB's proposal to accelerate commercial deployment across many heavy-duty vehicle sizes and classes of vehicles through the use of incentive funding. However, to achieve the transformational change needed in the freight sector to create healthy communities, a well-coordinated suite of voluntary incentives and regulatory measures will be necessary. As such, incentive funds should be used to advance the goals of ARB's Sustainable Freight Initiative, and should complement the regulatory measures that the Board instructed staff to pursue at the April Board Hearing.

Sincerely,



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