



July 8, 2016

Re: Comments on CARB 2030 Target Scoping Plan Update Concept Paper

Since the Clean Air Act was signed into law by President Nixon in 1971, the greater Los Angeles Metropolitan area has not been able to meet federal air quality standards. Much progress has been made, but to finally meet those standards, we will need continued strong public-private partnerships. The residents of Los Angeles County bear a very disproportionate health burden caused by the transportation of goods moving through the region to destinations hundreds of miles away. These problems are heavily concentrated in low-income communities of color along the I-710, I-60, and I-10 corridors. Addressing them will help to remedy our most difficult environmental justice challenge in the state.

Diesel emissions are the most toxic of all air contaminants, a major cause of lung cancer, asthma, heart disease and other health problems. Diesel vehicles contribute 42% of Southern California's NOx, a critical precursor to ozone, as well as 70%+ of our particulate matter. Locally, diesel emissions account for 84% of the cancer risk from breathing toxic air contaminants.

Strategies that have succeeded in bringing clean heavy-duty vehicles to the market, such as the Carl Moyer Program, Greenhouse Gas Reduction Fund (GGRF) and Proposition 1B funds; are those where public resources have been invested in partnerships with private engine, bus and truck manufacturers, as well as bus fleets and trucking companies, to develop and demonstrate cleaner technologies, often natural gas, electric or hybrid-electric for some applications.

While public-private investment programs have worked well to develop and demonstrate clean technologies, **deployment on scale is needed.** Ramping up production of zero and near-zero emission heavy-duty vehicles as well as their charging and fueling infrastructure is expensive and risky.

Resources are available however ***they come from the legislative process, inherently lack the long-term stability needed to truly reduce risk and incentivize the industry to fully deploy zero- and near-zero emission heavy-duty vehicle technologies. This can stimulate an extension of the GGRF program that is needed to leverage new sources of revenue like a new ballot measure or authority to increase the sales tax on diesel fuel to go towards the investment towards cleaner vehicles, the supporting infrastructure and community mitigations.***

ARB must play a very important role in accelerating the use of zero- and near-zero emission buses and trucks by providing long term reliable purchase incentives. No clean air agency has the authority to go to the voters through a ballot initiative. A possibility to strongly consider in this scoping plan is an option to go to the ballot to incorporate not only to leverage with GGRF funds but consideration to the increase in the taxes on diesel fuel that will go directly to help the industry invest in cleaner zero and near zero heavy duty truck technologies such as; power stations along major truck corridors and truck stops, or funding for infrastructure to help improve the efficiency of Goods Movement such as railroad grade separations over or under key boulevards and arterials. This would help manufacturers and fleet operators believe there is a strong long term commitment that helps ensure the market for this technology will continue to develop.

Sincerely,

Denny Zane
Move LA, Executive Director