APCD
AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

December 13, 2011

Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

RE: PROPOSITION 1B GOODS MOVEMENT EMISSION REDUCTION PROGRAM STAFF REPORT – 2011 FUNDING AWARDS

Mr. Goldstene:

We have reviewed the Staff Report for Proposition 1B Goods Movement Emission Reduction Program (GMERP) 2011 Funding Awards and we fully support the funding allocations outlined in the report. Due to the overwhelming response to our March/April 2011 solicitation, there are nearly 350 in-use diesel trucks with uncontrolled emissions currently on the waiting list for funding in the San Diego/Border Trade Corridor (approximately 190 in San Diego County and 150 in Imperial County). Your staff's proposed allocation of a minimum of $8 million in additional GMERP funding to the San Diego/Border Trade Corridor will help to expeditiously achieve additional emission reductions from truck-related goods movement activity in our trade corridor.

Your staff's proposal also includes a recommendation to approve a temporary variance from the current GMERP Guidelines to allow for a streamlined application process for priority drayage truck funding. Staff's recommended streamlined process for priority drayage trucks include:

1) Allowing districts to waive the requirement that owners submit documentation to verify their reported vehicle miles traveled (owners will still need to certify annual miles driven in California and in the trade corridors);
2) Simplifying the verification of vehicle registration using DMV data where possible;
3) Waiving the pre-inspection requirement for trucks that previously received retrofit funding;
4) Allowing truck owners to order replacement trucks before pre-inspection and/or contracting (at their own risk); and
5) Shortening the obligation and liquidation time periods for the local agencies to support the compressed time schedule.

We are supportive of these recommendations and we would like to request that these proposed temporary streamlining measures (particularly those pertaining to documentation regarding vehicle

miles traveled and vehicle registration) be permanently incorporated into the GMERP Guidelines for all project types. Permanent adoption of these streamlining measures will simplify the application process for equipment owners, ease the administrative burden for participating local agencies, and result in earlier achievement of the desired emission reductions.

Sincerely,

ROBERT J. KARD
Air Pollution Control Officer
San Diego County APCD

BRAD POIRIEZ
Air Pollution Control Officer
Imperial County APCD

cc: Ms. Barbara Van Gee, Manager
Goods Movement Programs Section
Air Resources Board/SSD
P.O. Box 2815, Sacramento CA 95812