

ATTACHMENT TO APRIL 14, 2006 BOARD LETTER ON GOODS MOVEMENT EMISSION REDUCTION PLAN

Specific Comments on the Analysis and Strategies

In addition to our main letter, we wanted to also take the opportunity to briefly comment on specific technical components of the Draft Goods Movement Emission Reduction Plan (ERP) scheduled for discussion at the April 20th ARB Board Hearing in Long Beach.

First, we wanted to commend your staff and acknowledge the significant progress and improvements that have been made to this plan over the course of its development. We greatly appreciate the efforts of ARB staff to address some of our previously raised concerns in the current ERP, especially given the tight timeframe. The latest draft of the ERP synthesizes into one document the most comprehensive-to-date analysis of the current and future emissions of California's Goods Movement system, as well as the corresponding health impacts and strategies necessary to reduce those impacts. Specifically, we are particularly pleased that the analysis now incorporates the following:

- *Domestic truck and train contribution* of the goods movement system (added in the latest iteration);
- *Additional quantified health impacts* have been included resulting in the latest figures attributing roughly 2,400 annual premature deaths and \$200B in health costs over the next 15 years to California's Goods Movement system;
- *Updated emission factors and emissions inventory for trucks* based on latest studies that shows higher than previously documented emissions. The emissions calculated also more accurately reflect the older average fleet age of Goods Movement related trucks;
- Explicit recognition within the ERP that *Goods Movement impacts many regions in the state including the San Joaquin Valley* highlighting the impacts that CARB must address going forward; and
- *More detailed explanations of the emission reductions* and associated costs of each measure.

Recognizing these positive additions, we urge staff to update the ERP in the future to include several important elements that are missing from the current draft. On February 28th of this year, we submitted very detailed comments on the Draft Goods Movement Emission Reduction Plan released on December 1st, 2005. The majority of the comments we made in this letter still apply to the current draft. Therefore, we are attaching those comments here for your reference.

The attached February 28th comments provide detailed recommendations on how each of the strategies included in the draft ERP should be structured with recommended timelines, specific emission reduction technologies and reasonable emission targets. The letter also details additional specific shortfalls of the health risk assessment.

In light of the latest draft of the ERP—the draft that will be discussed at the April 20th Board Hearing—we want to highlight a few significant additional concerns that have drawn our attention:

Key Additional Concerns - Emissions Inventory and Reduction Strategies

- Activity related to *air cargo at airports remains absent from the analysis*. Air cargo transport is expected to grow substantially in the next two decades. These major hubs of the goods movement system account for a significant number of truck trips. Associated emissions and health impacts should be included in an updated analysis.
- Similarly, *distribution centers and associated emissions are not specifically detailed* in the analysis. Many distribution centers in California are located immediately adjacent to neighborhoods. As trade volumes continue to increase, these hubs of the Goods Movement system continue to locate in the backyards of communities in California.
- We are pleased that the approach to mitigating truck emissions has been refined in ARB's 'Evaluation of Port Trucks and Possible Mitigation Strategies' released on April 12th. However, we are concerned that the current approach separating the On-road Private Fleet Rule from the Port Truck Fleet Modernization strategy may cause significant delays in addressing the oldest, most polluting trucks. Without regulatory pressure, it will be difficult to achieve high levels of participation among older trucks in fleet modernization incentive programs. We look forward to providing more comments and working closely with staff on this issue.

Key Additional Concerns - Health Analysis

- Although mentioned in the report, the current draft ERP still does not incorporate recent scientific studies that indicate the *health impacts from diesel PM may be significantly underestimated*. We urge ARB to incorporate these findings into the analysis.
- The latest draft ERP reports that initial results have shown that *uncontrolled SOx emissions from ships have the potential to increase the estimates of goods movement related health effects by roughly 25%*. Not only should these figures be incorporated into the analysis, but ARB should prioritize and aggressively move forward with strategies to reduce marine emissions.
- While we are pleased to see a regional analysis included in this ERP, we urge ARB to *assess the impacts of goods movement in each impacted community* in the future to ensure that these communities are being adequately protected.

In sum, we thank you and your staff for moving on an expedited timeline to prepare this Goods Movement Emission Reduction Plan. ***Finalizing and implementing a strong and aggressive ERP for goods movement is the most important step*** this Board can take to help ensure that regions throughout California attain state and federal clean air standards on time and that Californians breathe clean and healthy air.