

Bonnie Holmes - Gen

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AMERICAN LUNG ASSOCIATION OF CALIFORNIA
 BREATHE CALIFORNIA
 COMMUNITY ACTION TO FIGHT ASTHMA
 COMMUNITIES FOR CLEAN PORTS
 EAST YARD COMMUNITIES FOR ENVIRONMENTAL JUSTICE
 ENVIRONMENTAL DEFENSE FUND
 ENVIRONMENTAL HEALTH COALITION
 NATURAL RESOURCES DEFENSE COUNCIL
 REGIONAL ASTHMA MANAGEMENT AND PREVENTION INITIATIVE
 UNION OF CONCERNED SCIENTISTS
 WEST OAKLAND ENVIRONMENTAL INDICATORS PROJECT

May 20, 2008

Chairwoman Nichols and Board Members
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

**Re: Support for Staff Recommendations for Proposition 1B Goods Movement
 Emissions Reduction Funding, Fiscal Year 2007-2008.**

Dear Chairwoman Nichols and Members of the Board:

On behalf of the undersigned organizations, we submit comments in support of the staff recommendations for the first year of Proposition 1B Goods Movement Emissions Reduction Program funding. We are grateful that staff moved expeditiously to process these applications so that the funds can be disbursed quickly, offering relief to communities throughout California that suffer enormous health impacts from freight transport related air pollution. This proposal meets the objectives of the guidelines adopted in February of this year, as well as meeting our goals of targeting these funds to reduce pollution in a way that provides the greatest benefit to those most impacted by the transport of freight. Below we provide some more specific comments on the program.

We strongly encourage CARB to continue involvement with the local agencies' programs that are funded, for several reasons. First, CARB should ensure that local agencies perform adequate outreach and offer sufficient technical assistance to small businesses so that access to the funds is equitable. The suggestions for outreach and technical assistance in the guidelines should be mandatory.

Second, CARB must also maintain involvement in local programs to ensure that funds are spent quickly and appropriately. For example, some of the recommendations, such as truck repowers, may need to be reprogrammed if funds are not spent. Past truck repower

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programs have not been successful, in part because new engines tend to be worth more than the value of the older truck being repowered. If truck repower or other programs do not progress in a timely manner, CARB should intervene to work with the local agency to reprogram the funds to more successful projects.

Finally, CARB staff should ensure that local agencies provide the required matching funds and that these funds are available before projects move forward. For example, we are concerned that some local agencies, such as the Port of Oakland, will not have matching funds in place quickly enough. CARB should work closely with these agencies to ensure that the matching fund programs are expeditiously developed where necessary.

We appreciate all of the hard work that staff has put into these recommendations and applaud CARB for moving quickly on this important program.

Sincerely,



Adrian Martinez
Project Attorney
Natural Resources Defense Council

On Behalf of:

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Cc: Cynthia Marvin, CARB