

Sean Edgar

10-3-3



March 25, 2010

Mary Nichols
Chairman
Air Resources Board
P.O. Box 2815
Sacramento CA 95812

**Re: Comments on Goods Movement Emission Reduction Program and
Proposed Guideline Amendments (Hearing of March 25, 2010)**

Dear Chairman Nichols:

Operation Clean Air (OCA) is a non-profit organization concerned with air quality in the San Joaquin Valley. The purpose of this letter is to add our voice to the many Valley-based organizations urging the Board to distribute Proposition 1B funding in a manner that assists California businesses.

OCA shares ARB's priority that eligible projects ready for quick implementation be selected in the competitive process described in the Guidelines. We offer the following observations on what are, in our view, the short and long term needs that are lacking in the current process:

- Short-term: Valley businesses that may be able to afford a 2007 or newer engine will have the maximum possible award reduced to \$40,000, rather than the current \$50,000 limit. The ARB should consider raising the maximum award for this category.
- Short-term: Valley businesses are struggling to make use of Proposition 1B funds due to the economy. Of all the state transportation corridors, the San Joaquin Valley is the only one that is committed to attaining the 8-hour ozone standard in 2017 and absent a greater share of Bond funding we will fall short on "jump-starting" the process.
- Long-term: The \$250 million total for the Valley (i.e. 25% of the \$1 billion program) is not consistent with the ARB modeling indicating that more than 34% of the truck source category emissions occur in the Valley. Recent modeling suggests that 45% of all truck emissions in the four major corridors occur in the Valley. Multiplying the truck source category (76%) by the percentage of those emissions that occur in the Valley (45%) yields in excess of 34%.

The Valley's need is greater than what is reflected in the allocation adopted by the Board in 2008 and we ask that our comments to raise the allocation be considered by the Board this Summer. We look forward to continued collaboration with ARB.

Sincerely,

for

Hal H. Bolen
President
Chairman Mary Nichols

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CC: Ms. Cynthia Marvin, ARB
Mr. Samir Sheikh, San Joaquin Valley APCD
OCA Executive Committee