Environmental Health Coalition

COALICION de SALUD AMBIENTAL

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June 20, 2010

Cynthia Marvin
Assistant Division Chief
Planning and Technical Support Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Request Revision of Air Resources Board Staff Recommendation for San Diego APCD Funding Allocation

Dear Ms. Marvin:

Environmental Health Coalition (EHC) is a nonprofit environmental and social justice organization working in the San Diego/Tijuana region to empower people, organize communities, and achieve justice. EHC has been closely involved with the ARB funding initiatives for retrofits and improvement of diesel trucks that are significant polluters of the communities we represent.

We understand that the ARB staff recommendation regarding the funding allocations is to split the $500 million into two funding phases, based on the availability of bond funding. Phase 1 will be allocated at the June 24th Board meeting, at which time the Board will consider allocation of $200 million. We understand that staff is recommending that only $500,000 in funding be awarded to APCD during Phase 1 for harbor craft and does not recommend any funding at this time to address pollution from San Diego trucks . Phase 2 funding would not be awarded until after the sale of additional bonds in spring 2011.

This is a significant issue and set back for us locally. The most recent truck reporting from the Port of San Diego revealed at least 30 trucks eligible for Prop1B funding for a truck replacement if the requirement that the old truck already have a DPF were not in place. These 30 trucks all visit the Port at least three times a quarter, or 12 times a year, are all 1994-2003 model year trucks, and are noncompliant. Together they were responsible for 496 port visits, or almost 40% of the total 1313 noncompliant visits. All 30 of these could be replaced for only $1,500,000 of Prop1B money – a small chunk of the $60 million our region is slated to receive from Prop 1B.

The preliminary recommendation from ARB staff for the San Diego/Border region is less than 2% of the $200 million currently available. The target adopted by ARB for our corridor is 6% - we will be requesting that they allocate 6% of the funds ($12 M) to the San Diego/Border corridor.

In these difficult economic times, the hardest hit are those who suffer health problems. Toxic diesel pollution causes cancer and other severe illnesses – which carry a huge economic burden for these individuals and San Diego.

We are urging you to reconsider and allocate Phase 1 money to the San Diego APCD for trucks. Please know that we will support you in anyway to ensure all residents, especially those who bear a disproportionate burden, have clean air to breathe.

Thank you again for your consideration.

Sincerely,

Diane Takvorian

Diane Takvorian
Executive Director

cc: Port of San Diego
San Diego Air Pollution Control District