



San Joaquin Valley
Air Pollution Control District

February 22, 2006

Catherine Witherspoon
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Opportunity for comment on the *Air Resources Board Draft: Emission Reduction Plan for Ports and International Goods Movement in California*
(Release Date: December 1, 2005)

Dear Ms. Witherspoon,

The San Joaquin Valley Air Pollution Control District (District) is pleased to submit comments on the *Air Resources Board (ARB) Draft: Emission Reduction Plan for Ports and International Goods Movement in California (12/1/05)*. The District appreciates the tremendous effort dedicated to this plan, especially with respect to the short time frame allowed for completion. In addition to commending your effort, we would like to take this opportunity to highlight the role that the San Joaquin Valley Air Basin (SJVAB) plays in the goods movement industry and to offer comments.

The SJVAB plays a vital role in facilitating the movement of goods to the rest of the State and nation. Interstate 5 and State Route 99 serve as major routes for North-South movement of goods between Los Angeles and San Francisco Bay areas. North-South rail lines extend through the Central Valley corridor, through which the future high-speed rail will be located. In addition, the Port of Stockton, which is located in the San Joaquin County portion of the SJVAB, may experience increased activity with planned expansion of its terminal facilities. As the projected increase in goods coming from the Pacific Rim (fourfold by 2020) becomes a reality, the North-South corridor of roads and rails through the SJVAB is likely to experience commensurately significant increases in transportation activity.

As you are aware, the SJVAB faces tremendous challenges in improving its air quality to meet current and proposed State and federal ambient air quality standards. The District has passed approximately 500 rules, amendments, and updates since 1992, and has achieved an overall 54% reduction in stationary source emissions. Attainment of State and federal ambient air quality standards in the SJVAB is inextricably linked to effective reduction of pollution from sources within the regulatory authority of State and federal agencies. Thus, with regards to the *Draft Emission Reduction Plan for Ports and International Goods Movement in California*, we recommend the following:

Northern Region Office
4800 Enterprise Way
Modesto, CA 95356-8718
(209) 557-6400 • FAX (209) 557-6475

Central Region Office
1990 East Gettysburg Avenue
Fresno, CA 93726-0244
(559) 230-6000 • FAX (559) 230-6061
www.valleyair.org

Southern Region Office
2700 M Street, Suite 275
Bakersfield, CA 93301-2373
(661) 326-6900 • FAX (661) 326-6985

1. Develop an all-inclusive 2001 baseline inventory, comprised of emission inventories from the widened scope of both domestic and international goods movement, including all modes of transport (e.g. trucks, locomotives, air cargo freight, etc.) Project future emissions for key federal attainment/reasonable further progress years. Ensure the ability to claim State Implementation Plan credit for emission reductions that result from goods movement emissions mitigation.
2. Maintain the *Draft Emission Reduction Plan's* strategy of using market participation concepts to enable ports to use their lease agreements to negotiate greater use of low-emission technology.
3. Fund and implement infrastructure improvements and emissions mitigation on a continuous and simultaneous basis. Projects should not begin until solid funding plans for both are secured. All infrastructure improvement projects should use the best available control measures and innovative technologies.
4. Promote the concept that funding for emission reductions should come from the new revenue sources related to the increased trade. Fees need to be proportional to the value of the goods. For example: a container of high-end electronics would face higher fees than the same size container of agricultural produce.
5. Pursue the *Draft Emission Reduction Plan's* first objective to stop emissions growth. We support the stated goals of reducing emissions to 2001 levels by 2010, continuing reductions until attainment of applicable standards is achieved, reducing diesel-related health risks 85% by 2020, and reducing localized risk in each affected community. The District encourages widening the scope and application of these goals to all aspects of the goods movement industry.

The District endorses the ARB staff's stated vision of creating an economically vibrant, environmentally sustainable, non-polluting goods movement industry that enhances the quality of life for all Californians.

Thank you for the opportunity to comment on the *ARB Draft: Emission Reduction Plan for Ports and International Goods Movement in California*. If you have any questions please contact Ms. Lauren Dawson at lauren.dawson@valleyair.org or at (559) 230-5800.

Sincerely,



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Deputy Air Pollution Control Officer
San Joaquin Valley Air Pollution Control District

cc: Jeff Lindberg, ARB