

## **Comment 1 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Michael

Last Name: Simon

Email Address: transpower@sbcglobal.net

Affiliation: TransPower

Subject: Truck electrification

Comment:

We propose that amendments to program guidelines also provide for financial assistance to buyers of zero-emission electric trucks. Existing provisions appear to provide for grants of up to \$60,000 per vehicle for replacement of trucks with newer model year engines. Replacement trucks using electric drive systems would produce even lower emissions, and should be encouraged, now that such technologies are becoming available. Also recommend allocating some funds to supporting demonstration vehicle projects that can accelerate advancement and commercialization of new electric truck technologies.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-03-17 15:49:43

No Duplicates.

## **Comment 2 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Kirk  
Last Name: Marckwald  
Email Address: kirk@ceaconsulting.com  
Affiliation: California Railroad Industry

Subject: Freight Railroad Comments on Proposition 1B Agenda Item 10-3-3  
Comment:

Please see enclosed comments on Agenda Item 10-3-3.

If you have questions, please contact Sarah Weldon 415-421-4213 x34.

Regards,  
Kirk Marckwald  
California Railroad Industry  
415-421-4213 x12

Attachment: 'www.arb.ca.gov/lists/goods2010/2-10\_0318\_rail\_comments\_on\_prop1b.pdf'

Original File Name: 10\_0318 Rail Comments on Prop1B.pdf

Date and Time Comment Was Submitted: 2010-03-18 14:39:02

No Duplicates.

### **Comment 3 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Jack

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation: Executive Officer/APCO

Subject: goods2010

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/goods2010/3-goods2010comment.pdf'

Original File Name: goods2010comment.pdf

Date and Time Comment Was Submitted: 2010-03-18 15:45:20

No Duplicates.

## **Comment 4 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Ryan  
Last Name: Wiggins  
Email Address: [rwiggins@cleanports.org](mailto:rwiggins@cleanports.org)  
Affiliation: Communities for Clean Ports

Subject: Proposed Guidelines for Proposition 1B  
Comment:

Please see the attached file for our comments regarding the Proposed Update to the Proposition 1B Guidelines. Thank you.

Ryan Wiggins  
4000 Long Beach Blvd. Suite 249  
Long Beach, CA 90807  
(323) 474 - 4650  
[rwiggins@cleanports.org](mailto:rwiggins@cleanports.org)

Attachment: 'www.arb.ca.gov/lists/goods2010/4-prop1bguidelinescommentscommunitiescleanports.doc'

Original File Name: Prop1BGuidelinesCommentsCommunitiesCleanPorts.doc

Date and Time Comment Was Submitted: 2010-03-24 11:31:15

No Duplicates.

## **Comment 5 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: David

Last Name: Merk

Email Address: dmerk@portofsandiego.org

Affiliation: San Diego Unified Port District

Subject: Comments on proposed updates to the Prop 1B GMERP Guidelines

Comment:

We are writing to provide comments on the proposed updates to the Proposition 1B: Goods Movement Emissions Reduction Program Guidelines (Program Guidelines). While we support the intent of the Air Resources Board (ARB) staff to make this program more effective for local agencies, we are submitting comments on some issues that would put projects in the San Diego region at a disadvantage.

Administering truck funds as a single category

The proposed modifications to the category funding targets that would combine funding for drayage trucks with funding for non-drayage trucks would be detrimental to trucks serving the Port of San Diego. This change would put drayage trucks at a competitive disadvantage because they can no longer receive credit (in the form of cost-effectiveness) for particulate matter (PM) reductions that are now required by the ARB Drayage Truck Regulation. Although ARB staff is recommending to reserve up to \$100 million to replace drayage trucks that are equipped with PM retrofits, the conditions on these funds limits the number of trucks that will be eligible in San Diego. Therefore, we would expect few drayage trucks to qualify for this reserve funding and that most of that funding will be spent in other air districts/trade corridors.

Allowing Limited Truck Operations Outside of California

Truck activities at the Port of San Diego do not fit the typical drayage truck model that occurs at ports such as Oakland, Los Angeles, and Long Beach. We operate as a "niche port" and deal with a variety of cargo. As such, our truck population varies depending on the economy and the type of cargo we receive. The original requirement of 100% California operation has been a significant issue for the Port of San Diego. Many of the trucks servicing our port make occasional trips across the border into Nevada, Arizona, and Mexico, making them ineligible for funding. Often, these are independent owner-operators and small fleets that cannot afford to take advantage of these grants unless they can retain the ability to take occasional jobs outside of California. While we appreciate the willingness of ARB staff to allow an option of 90% California operation, the reduced funding available for this option and the additional expenses required to verify compliance are an extra burden. We understand the need to verify compliance, but feel funding amounts should not be different between 90% and 100% California operation.

The Port is committed to reducing air emissions from goods movement activities in the San Diego region and we appreciate the opportunity to provide comments on the proposed Program Guidelines.

Sincerely,

David Merk  
Director, Environmental Services Department  
San Diego Unified Port District

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-03-24 11:24:06

No Duplicates.

## **Comment 6 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Nidia

Last Name: Bautista

Email Address: Non-web submitted comment

Affiliation:

Subject: Coalition for Clean Air

Comment:

Please see attachment

Attachment: 'www.arb.ca.gov/lists/goods2010/6-nidia.pdf'

Original File Name: Nidia.pdf

Date and Time Comment Was Submitted: 2010-03-24 13:33:46

No Duplicates.

## **Comment 7 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Scott

Last Name: Carpenter

Email Address: Non-web submitted comment

Affiliation:

Subject: RJ Coleman Railpower LLC

Comment:

Please see attachment

Attachment: 'www.arb.ca.gov/lists/goods2010/17-scott.pdf'

Original File Name: Scott.pdf

Date and Time Comment Was Submitted: 2010-03-26 16:34:24

No Duplicates.



## **Comment 8 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Lee

Last Name: Harrington

Email Address: Non-web submitted comment

Affiliation:

Subject: Southern California Leadership Council

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/goods2010/18-lee\_harrington.pdf'

Original File Name: Lee Harrington.pdf

Date and Time Comment Was Submitted: 2010-03-29 10:57:06

No Duplicates.

## **Comment 9 for Proposition 1B: Goods Movement (goods2010) - Non-Reg.**

First Name: Tim

Last Name: Schott

Email Address: Non-web submitted comment

Affiliation:

Subject: Schott & Lites Advocates

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/goods2010/19-schott.pdf'

Original File Name: Schott.pdf

Date and Time Comment Was Submitted: 2010-04-15 09:48:05

No Duplicates.

## **Comment 1 for Proposition 1B: Goods Movement (goods2010). (At Hearing)**

First Name: Omar

Last Name: Benjamin

Email Address: Non-web submitted comment

Affiliation:

Subject: Port of Oakland

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/goods2010/10-omar.pdf](http://www.arb.ca.gov/lists/goods2010/10-omar.pdf)

Original File Name: omar.pdf

Date and Time Comment Was Submitted: 2010-03-26 14:56:58

No Duplicates.

## **Comment 2 for Proposition 1B: Goods Movement (goods2010). (At Hearing)**

First Name: Grace

Last Name: Napolitano

Email Address: Non-web submitted comment

Affiliation:

Subject: U.S. Congress

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/goods2010/11-grace.pdf](http://www.arb.ca.gov/lists/goods2010/11-grace.pdf)

Original File Name: Grace.pdf

Date and Time Comment Was Submitted: 2010-03-26 14:56:58

No Duplicates.

### **Comment 3 for Proposition 1B: Goods Movement (goods2010). (At Hearing)**

First Name: Alan

Last Name: Lowenthal

Email Address: Non-web submitted comment

Affiliation:

Subject: California State Congress

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/goods2010/12-alan.pdf](http://www.arb.ca.gov/lists/goods2010/12-alan.pdf)

Original File Name: Alan.pdf

Date and Time Comment Was Submitted: 2010-03-26 14:56:58

No Duplicates.

## **Comment 4 for Proposition 1B: Goods Movement (goods2010). (At Hearing)**

First Name: Mike

Last Name: Jacob

Email Address: Non-web submitted comment

Affiliation:

Subject: Pacific Merchant Shipping Association

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/goods2010/13-mike.pdf](http://www.arb.ca.gov/lists/goods2010/13-mike.pdf)

Original File Name: Mike.pdf

Date and Time Comment Was Submitted: 2010-03-26 14:56:58

No Duplicates.

**Comment 5 for Proposition 1B: Goods Movement (goods2010). (At Hearing)**

First Name: Sean

Last Name: Edgar

Email Address: Non-web submitted comment

Affiliation:

Subject: Operation Clean Air

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/goods2010/14-sean.pdf](http://www.arb.ca.gov/lists/goods2010/14-sean.pdf)

Original File Name: Sean.pdf

Date and Time Comment Was Submitted: 2010-03-26 14:56:58

No Duplicates.

## **Comment 6 for Proposition 1B: Goods Movement (goods2010). (At Hearing)**

First Name: Richard

Last Name: Sinkoff

Email Address: Non-web submitted comment

Affiliation:

Subject: Port of Oakland

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/goods2010/15-richard.pdf](http://www.arb.ca.gov/lists/goods2010/15-richard.pdf)

Original File Name: Richard.pdf

Date and Time Comment Was Submitted: 2010-03-26 14:56:58

No Duplicates.



## **Comment 7 for Proposition 1B: Goods Movement (goods2010). (At Hearing)**

First Name: Lakhbir

Last Name: Bhambra

Email Address: Non-web submitted comment

Affiliation:

Subject: Northern California Port and Rail Truckers Association

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/goods2010/16-lakhbir.pdf](http://www.arb.ca.gov/lists/goods2010/16-lakhbir.pdf)

Original File Name: Lakhbir.pdf

Date and Time Comment Was Submitted: 2010-03-26 14:56:58

No Duplicates.