



April 23, 2019

The Honorable Ben Allen
California State Senator
California State Capitol
Sacramento, CA 95814

Re: Senate Bill 732 (Allen) - SUPPORT and propose amendments: 1) investments in reductions of greenhouse gas emissions; 2) investments in Metrolink regional commuter rail infrastructure and service; and 3) investments in county planned and implemented transit and active transportation infrastructure and service.

Dear Senator Allen:

We the undersigned organizations write to support Senate Bill 732 (Allen), and would like to propose amendments that we believe will result in major advances for clean transportation in Southern California.

The bill as written will authorize the South Coast Air Quality Management District to place a measure before voters in its district to raise the transaction and use tax for the purpose of raising funds needed to fully implement the 2016 Air Quality Management Plan and reach federal air quality attainment standards. It will also enable voters in the South Coast District to qualify a ballot initiative for the same purpose.

We must treat 2031 as our deadline for attaining federal attainment standards lest the South Coast counties be subject to withholding of federal transportation funds.

Such a potential measure is an environmental imperative. The South Coast Air District has very limited regulatory authority to address the challenge of mobile source air pollution, especially with respect to heavy-duty vehicles where emission standards are principally a matter of federal authority. To achieve clean air, there is no serious alternative to a regime of incentives sufficient to facilitate a swift transition from diesel-powered technologies to zero and near-zero emission alternatives.

Providing such incentives requires serious funding. While the State of California has made major commitments to investments in deployment of clean vehicle technologies, the state cannot and should not have to do it alone.

The scale of our efforts must be enhanced, as well as its predictability and reliability. Only local ballot measures can provide both the scale of funding and the reliability needed over time to ensure an industry makes the necessary investments to achieve the economies of scale required to fully transition to clean technologies.

Such funding will be especially important to implement the AQMP's mobile source program which requires very significant reductions in criteria pollutants, especially from diesel on-road and off-road sources.

However, there are other emission challenges that are very urgent. The Intergovernmental Panel on Climate Change (IPCC) made it clear that we must accelerate our efforts to reduce greenhouse gas emissions by 2030 if we are to avoid the worst effects of climate change.

In addition, our planet's most problematic greenhouse gas emissions may be a class of emissions termed short-lived climate pollutants (SLCPs) which include black carbon, methane, primarily biomethane, and hydrofluorocarbons (HFCs). These pollutants are the most powerful drivers of climate change but are relatively short-lived in the atmosphere.

According to a recently released report by the Center for Climate and Energy Solutions (C2ES), such emissions are responsible for up to 40% of global warming. Yet, the most abundant SLCP, methane, decays within 12 years. Early actions to reduce, capture and use or sequester methane and other SLCPs can yield very significant near-term climate benefits. C2ES states that targeted efforts to reduce these emissions can slow the pace of global warming by 0.6 degrees Celsius by 2050, while the consequences of delaying action could be dire. The California Air Resources Board Short-Lived Climate Pollutant Reduction Strategy March 2017 offered the same assessment.

In light of this urgency, we suggest the following:

Recommendation #1: SB 732 should expressly enable funding specifically for enhanced reductions in greenhouse gas (GHG) emissions that cause climate change, understanding that this may include investments that reduce short-lived climate pollutants. Such reductions are necessary to reach ambitious California State climate standards set by the Legislature, as transportation accounts for 50% of emissions known to cause climate change.

Southern California has the dirtiest air in the country, with 90% of NOx emissions coming from transportation sources and 80% from heavy-duty, mostly diesel, vehicles. The heaviest exposure to diesel exhaust, declared a toxic air contaminant by the State of California, is experienced by low-income communities of color living along the goods movement corridors, especially the I-710 and the I-60. It is a public health and an environmental justice imperative that we replace diesel with clean technologies because it kills thousands of people and harms the health of millions every year.

Recommendation #2: SB 732 should be amended to enable ballot measures authorized in the South Coast Air District to include funding provided by truck registration fees, perhaps up to \$100 per vehicle per year.

We believe the financial burden of clean up should be broadly shared, including by those who operate diesel vehicles. Environmental Justice advocates are right when they argue that truck operators are the persons who will most directly benefit from the funding provided.

Recommendation #3: SB 732 should be amended to enable ballot measures it authorizes to include funding for expenditures in the modernization of our regional commuter rail system, Metrolink. Such investments could include electrification, enhanced velocity, enhanced and express service, lower fares, and connections directly into regional airports like Ontario. Ballot measures that provide such funding for Metrolink should direct that funding to the Southern California Regional Rail Authority to implement plans adopted by that agency.

Each of Southern California's counties have won approval from local voters for measures to invest in their transportation systems. Los Angeles County voters have recently approved two such measures, R and M. Within those investment programs transit system investments and active transportation system investments are consistent with the goals of reducing both air pollution and greenhouse gas emissions and ought to be enabled as appropriate expenditures within ballot measures authorized by SB 732.

This is particularly true of the regional commuter rail system, Metrolink. Investments in Metrolink can reduce not only air pollution and greenhouse gases but also reduce regional traffic congestion and provide opportunities for thousands of jobs and expanded regional economic opportunity.

Recommendation #4: SB 732 should be amended to enable ballot measures it authorizes to include funding for county transportation commission planned and implemented transit system infrastructure or operations enhancements using zero or near-zero emission vehicles, including bus, bus rapid transit (BRT), light and heavy-rail, monorail systems, as well as bicycle and pedestrian infrastructure. Ballot measures that provide such funding for transit or active transportation improvements should direct that funding to the respective county transportation commissions to implement plans adopted by that agency.

Similarly, county level investments in transit systems and services are effective emission reduction programs, especially if the vehicles used are zero or near-zero-emission technologies. In addition, investments in bicycle and pedestrian active transportation infrastructure are effective emission reducers and should be enabled in any regional ballot measure.

Recommendation #5: We urge the legislature to ensure that every agency with responsibility for expending taxpayer funds as may be provided by a measure authorized by SB 732 has strict provisions for accountability, transparency and oversight.

SB 732, especially if amended as proposed, will continue California's vital leadership in fighting both air pollution and climate change and enable Southern California to be a major partner in those efforts. The Air District's necessary plan to accelerate the deployment of zero emission cars, zero and near-zero emission trucks and other vehicles here in Southern California taken together with the efforts of the State of California, will drive manufacturing of these clean vehicles to far greater volumes and ensure they are available and affordable to many.

That will be the moment when we can actually envision air pollution and climate change becoming part of our children's past rather than their future.

Sincerely,

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Move LA

Jonathan Parfrey
Executive Director
Climate Resolve

Bill Magavern
Policy Director
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