



June 22, 2018

Fran Inman, Chair
California Transportation Commission (CTC)
1120 N Street MS 52
Sacramento, CA 95814

Mary Nichols, Chair
California Air Resources Board (CARB)
1001 "I" Street
Sacramento, CA 95814

Sent via email and submitted to the CARB public comment docket for AB 179

Re: Opportunities to accelerate transportation electrification infrastructure and maximize emissions reductions to Freight impacted communities

Dear Chair Inman and Chair Nichols:

On behalf of the undersigned organizations, we are welcome the opportunity to embark on a new collaboration and provide these comments to ensure that California's transportation needs and ambitious Climate Goals complement each other and provide benefits to communities overburdened by pollution from our state's transportation sector.

As we discuss solving the air pollution harms faced by communities near heavy freight operations, and addressing the transportation infrastructure needs we must pursue solutions that fully solve the problem. The communities we work with, located in the shadows of some of the nation's largest freight facilities, want zero-emission technologies. The California Transportation Commission and California Air Resources Board have the opportunity to work together to leave a lasting positive impact in California. Transportation is central to Californians' daily life and the various economic sectors that they rely on to meet their needs and wants. It is also our largest source of air pollution, and is causing irreparable damage to the health of environmental justice communities living at the front lines of the freight industry.

We urge you both, as leaders of your respective agencies, to seize the opportunity created by AB 179. The joint meetings of the CTC and CARB are an opportunity to tackle the underlying issues that are behind the unsustainability of current transportation trends. There is a huge need for charging infrastructure, including clean energy resources like energy storage, for larger on- road and off-road vehicles. The real driver in deadly regional air pollution is the equipment in the freight industry. While cars contribute to our ozone and fine particulate woes, they are not as significant a driver of our air pollution. Personal, light-duty vehicles are a major driver of our GHG pollution fostered by practices that reinforce the primacy of single-occupancy vehicle use over more sustainable modes of transportation.

Alleviating the immense burden of air pollution created by our transportation sector, freight in particular, requires several complementary strategies. In addition to our recommendations below focused on prioritization of the electrification of medium and heavy duty vehicles to reduce air pollution focusing on communities burdened by freight traffic; we wholly support the concerns articulated by partners on VMT reduction to halt the misguided practice of adding road capacity in the name of congestion relief in urban, high-growth areas. These strategies are mutually supportive, and each are necessary -- we must not pursue one without the others.

Some of the top issues that we believe must be addressed are:

1. Need for assessment of heavy duty infrastructure needs. Prioritizing zero emissions infrastructure does not mean curbing economic growth. Transportation infrastructure needs and assessments need to go beyond traditional planning context and produce comprehensive analysis of the state's electrification infrastructure needs specifically emphasizing the needs of heavy-duty vehicles. Electrification of our transportation infrastructure would result in health benefits valued at over \$21 billion dollars. We must emphasize zero emissions technologies and explicitly move away from combustion vehicles.
2. Cross- Agency Collaboration: California Air Resources Board needs to work closely with utilities like Southern California Edison and Los Angeles Department of Water & Power, in addition to regulatory agencies like the California Public Utilities Commission and the California Energy Commission, to make sure there is a common understanding that heavy-duty zero-emission vehicle infrastructure is under-funded. In the Scoping Plan transportation element – prioritization of zero emissions infrastructure should be explicit.
3. Off road emissions: Targeting off-road emissions is an essential component of any strategy aimed at improving emissions related to California's transportation infrastructure. A comprehensive zero-emission strategy should ultimately include all of the off-road diesel equipment at our ports, railyards, and warehouses. Uniquely addressing emissions from vehicles will contribute to attainment of GHG reduction targets but not criteria pollutants reductions. In order to address the myriad of emissions related to the broader transportation sector it is necessary to remove and transition all diesel equipment that's categorized as off-road.
4. Integrating Clean Air Targets Into Transportation Planning: The interaction between transportation planning process and the State Implementation Planning process is broken. Transportation planners are clearly not receiving the correct signals on how much air pollution is necessary to be reduced to meet federal and state clean air standards. While much of these reductions will come from CARB regulations, reductions are also needed from the design and

build of the transportation system. Currently, the targets for planners are too weak and do not encourage the systemic changes necessary to drive deep reductions to make it safe to breathe. This should be fixed.

We welcome the opportunity to continue to work with you and discuss these topics in greater depth. We hope that more cross-agency and cross-sector conversations will take place in the months ahead as we try to grapple with the interrelated issues of transportation, air quality, energy, climate and environmental justice.

If you have any questions about the content of this letter please contact Michele Hasson:
michele.h@ccaej.org

Respectfully,

Michele Hasson, Center for Community Action and Environmental Justice
Taylor Thomas, East Yards Communities for Environmental Justice
Adrian Martinez, Earth Justice
Kathryn Philips, Sierra Club California