

**From:** Chris Valadez [<mailto:cvaladez@cafreshfruit.com>]

**Sent:** Thursday, April 16, 2015 4:16 PM

**To:** ARB (Freight) Sustainable Initiative

**Subject:** Sustainable Freight Draft Document

Attention Ms. Arias:

Attached you find a comment letter on the Sustainable Freight Pathways Draft Document from the California Fresh Fruit Association. We hope to engage you and your team directly as this effort progresses. Thank you for the opportunity to comment.

Regards,

Christopher Valadez  
Director, Environmental & Regulatory Affairs  
California Fresh Fruit Association  
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April 16, 2015

Ms. Heather Arias  
Freight Transport Branch  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments in response to California Air Resources Board Sustainable Freight Pathways to Zero and Near-Zero Emissions, Discussion Draft (April 2015)**

Dear Ms. Arias:

The California Fresh Fruit Association appreciates the opportunity to offer comment on the Sustainable Freight Pathways Discussion Draft (Draft). As the public policy trade association representing California's permanent fresh fruit sector, excluding citrus and avocados, we would agree that our industry has an important role to play in achieving air quality goals. However, a transition to a zero emission transportation system generates concern amongst our fresh fruit industry members who rely upon internal combustion engine equipment for goods movement both throughout and beyond California. We support a more efficient transport system and recognize that the transition to achieving greater reductions in emissions, such as diesel particulate matter, means adopting newer, cleaner technologies however the pathways discussion should center how to cost-effectively transition to newer technologies in a manner that does not prematurely force our business community to retire functional equipment without financial support to support wide-level transitioning.

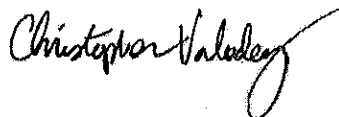
With respect to the reliance upon OEHHA's methodology for conducting health risk assessments we caution staff against moving aggressively based on the revised air toxics health risk methodology which does not rely upon actual data, and instead utilizes over conservative default assumptions to project the worst-case scenario, thus resulting overstatements of health risks. As you are aware, California businesses have worked with state and local air quality officials to help significantly reduce emissions and air toxic risks, greatly contributing to environmental and public health protection.

Of concern, the placement of a renewed emphasis on the prohibition of the use of fossil-fueled transport refrigeration units for cold storage has the potential to create new, difficult to enforce burdens onto packinghouse operations with refrigerated storage through imposition of facility emission caps and tracking requirements. Our members grow perishable fruit crops which are packed and prepared for shipment to market. Packer/shippers depend on availability and reliability of the transportation community to meet critical market windows and customer demands for product. Imposing a new regulatory obstacle onto facilities that would force an operation to potentially reject or limit carrier access onto facility property, thereby curtailing shipment represents no more than a narrowly constructed view of reducing emissions from transportation refrigeration units. This is one example of concern; another would be the LSI equipment electrification proposal, which highlights that the document does not convey

a sense of prioritization of emission reduction ideas that can be implemented in a cost-effective, minimally disruptive manner in order to achieve significant air quality benefits.

Thank you for the opportunity to provide comment on the Discussion Draft. Feel free to reach out to engage directly by contacting me at [cvaladez@cafreshfruit.com](mailto:cvaladez@cafreshfruit.com).

Regards,

A handwritten signature in black ink, reading "Christopher Valadez". The signature is fluid and cursive, with the first name "Christopher" written in a larger, more prominent script than the last name "Valadez".

Christopher Valadez  
Director, Environmental &  
Regulatory Affairs