



March 14, 2019

Via Electronic Mail

The Honorable Gavin Newsom  
Governor of the State of California  
State Capitol  
Suite 1173  
Sacramento, CA 95814

Dear Governor Newsom:

The California Cleaner Freight Coalition (CCFC) includes grassroots environmental justice, environmental, science, and health groups in California. The mission of the CCFC is to create transformational changes to the freight transportation system in California in order to protect the public's health, clean the environment, and promote social justice and equity.

Knowing full well the damage that diesel exhaust is wreaking on Californians' health, we were excited by your promise to "Set California on the Fast Track to Zero Diesel Pollution by 2030." CCFC looks forward to working closely with your administration on realizing this goal, which will mean rapidly reducing emissions from the freight sector that produces a disproportionate amount of California's dangerous air pollution. The following document provides CCFC's key policy recommendations.

#### **Budget & Legislation**

- Make 8-year commitment to allocate \$1 billion per year for incentives to replace old diesel engines in trucks, buses and freight equipment. Spend at least 80% of the funds in disadvantaged and low-income communities.

- CARB's Three-Year Heavy-Duty Strategy Investment Plan from 2018-19 called for \$450-735 Million in 2019-2020, \$610-940 the following year, and \$670-995 million in 2021-22.<sup>1</sup>
- The South Coast Air Quality Management District (SCAQMD) is home to 16.8 million Californians. In order to reach attainment of federal air quality standards, the SCAQMD estimates it needs \$1 billion per year in funding beginning.<sup>2</sup>
- The San Joaquin Valley Air Pollution Control District (SJVAPCD) also requires billions of dollars to reduce PM2.5 emissions. The district's clean-air plan calls for \$5 billion in incentive funding by 2024 to successfully reach attainment.<sup>3</sup>
- The current incentive programs, including HVIP & Carl Moyer, are consistently oversubscribed.
- Enact legislation requiring a Heavy Duty smog check program, analogous to the successful light-duty program.
- Enact legislation requiring a 100% renewable hydrogen standard to ensure sustainable hydrogen powered transportation.

## **CARB**

- Fleet Purchase & Turnover Requirements
  - Delivery trucks: Phase in new-purchase requirements so that by 2025, only zero-emission delivery trucks are bought by fleets with 10 or more trucks.
  - Long-haul trucks: Adopt a standard in 2019 requiring that by 2023 all new trucks sold in California meet or exceed the ultra-low-NOx standard.
  - Cargo Handling and Ground Support Equipment: strengthen standards so that by 2030 all new cargo handling and ground support equipment are zero emissions.
  - Agricultural Equipment: Ensure that by 2025 the oldest dirtiest diesel engines in tractors and other off-road agricultural equipment have been permanently retired.
  - Accelerate CARB's timeline for electric drayage trucks. The Ports of Los Angeles and Long Beach have set a goal of zero emissions drayage trucks by 2035.<sup>4</sup> A statewide rule should adopt the same requirement. Move forward the expected board hearing date of 2022.
- Vessels at berth: Strengthen standard in 2019 so that by 2025 all visits of ocean-going vessels to California ports utilize shore power or an alternative control technology.
- Transportation Refrigeration Units: Adopt rule in 2019 requiring all TRUs to emit zero emissions from combustion. Require warehouses and other facilities to have plug-in infrastructure to support their use.
- Low-Emission Diesel Standard: Adopt rule in 2020 requiring diesel fuel providers to steadily decrease criteria pollutant emissions from their diesel products.

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<sup>1</sup> ARB Heavy Duty Investment Plan, Page 86

[https://www.arb.ca.gov/msprog/aqip/fundplan/proposed\\_1819\\_funding\\_plan.pdf](https://www.arb.ca.gov/msprog/aqip/fundplan/proposed_1819_funding_plan.pdf)

<sup>2</sup> SCAQMD AQMP, page ES-9 <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf>

<sup>3</sup> CARB, Clean-air plan for San Joaquin Valley first to meet all federal standards for fine particle pollution, <https://www2.arb.ca.gov/index.php/news/clean-air-plan-san-joaquin-valley-first-meet-all-federal-standards-fine-particle-pollution>

<sup>4</sup> Port of Los Angeles & Port of Long Beach Clean Air Action Plan Update, Page 9

<http://www.cleanairactionplan.org/documents/presentations-3-29-18-caap-stakeholders-advisory-meeting.pdf/>

- Commercial Harbor Craft: Adopt rule in 2020 to turn over the fleet of Commercial Harbor Craft. Require Tier 2 or 3 engines be repowered with a Tier 4 engine, adopt zero-emission technology, or be retrofitted with a Verified Diesel Emission Control Strategy. Create an annual opacity testing requirement. Expand rules to all harbor craft, including engines with less than 50 horsepower.
- Locomotives: Adopt rule in 2022 to reduce diesel emissions from switcher, passenger and other locomotives within the State's jurisdiction.
- Construction equipment: Adopt rule by 2023 to strengthen diesel emissions standards for construction equipment and begin to require sales of zero-emission equipment.
- Backup Diesel Generators: Adopt rule to end the use of diesel backup generators.
- Truck manufacturing & sales requirement: Mandate that Original Equipment Manufacturers build, and sell zero-emission trucks. Expand the requirement beyond the proposed 15% by 2030.

#### **Infrastructure Planning and Spending**

- Instruct CalSTA and CalTrans to align their spending and planning with air quality and climate requirements, and appoint leaders to CalSTA, CalTrans and CTC who will carry out that directive; stop funding any expansions in roadway capacity.

#### **Enforcement**

- Improve enforcement of laws governing diesel emissions, especially in disadvantaged communities.

For more information contact Bill Magavern, Policy Director of the Coalition for Clean Air, at [bill@ccair.org](mailto:bill@ccair.org), 916-527-8051.

Sincerely,

/s/

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