



# South Coast Air Quality Management District

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## Interagency Partners:

California State Transportation Agency,  
California Environmental Protection Agency,  
California Natural Resources Agency,  
California Air Resources Board,  
California Department of Transportation, California Energy Commission,  
Governor's Office of Business and Economic Development

Dear Sirs:

### SCAQMD Staff Comments on the Draft California Sustainable Freight Action Plan

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the Draft California Sustainable Freight Action Plan (Plan). SCAQMD is responsible for air quality planning and regulation in the South Coast Air Basin. This region encompasses much of Los Angeles, Orange, Riverside and San Bernardino Counties, and is home to approximately 17 million residents. Despite much progress in reducing air emissions, this region has the worst air quality in the country, with substantial health impacts. The region is also a major freight gateway for the nation, and includes extensive freight rail operations. Equipment involved in rail operations, including locomotives, cargo-handling equipment, and trucks, are significant sources of nitrogen oxides and diesel particulate emissions. These emissions must be reduced for the region to attain federal air quality standards and address local health risks from toxic air contaminants near freight movement facilities such as marine ports, railyards and intermodal yards, and warehouse distribution centers. The draft Plan can and should play a significant role in achieving these goals.

To attain the 80 ppb ozone National Ambient Air Quality Standard by its 2024 deadline, the South Coast Air Basin must reduce emissions of nitrogen oxides by approximately 43 percent beyond the benefits of adopted regulations. By 2032, needed emission reductions increase to 55 percent to attain the 75 ppb ozone NAAQS. Failure to have plans sufficient to attain the NAAQS subjects the region to economic sanctions, including cut-

off of specified federal transportation funds and restrictions on permitting new stationary sources.

To attain these standards as required by federal law, the region will need to deploy the cleanest combustion technologies as soon as possible, and will need to transition to broad use of zero and near-zero emission technologies in the 2023 to 2032 timeframe.

Nitrogen oxide emissions from freight movement related sources (on-road heavy-duty trucks, locomotives, ocean-going vessels, commercial harbor craft, and cargo handling equipment) contribute over 35 percent of the total nitrogen oxides in the South Coast Air Basin and need to contribute to reductions if the region is to be able to attain these standards. Freight movement related sources are also sources of diesel particulate matter emissions.

### General Comments

The SCAQMD staff appreciates the interagency partners' efforts to establish clear targets to improve freight efficiency, transition to zero and near-zero emission technologies, and increase competitiveness of California's freight system, as directed by the Governor's Executive Order B-32-15. The proposed actions identified in the Plan will require coordinated efforts not only among the interagency partners, but also the freight movement industry, local and regional government agencies, and local air districts. The SCAQMD staff appreciates the incorporation of the California Air Resources Board draft State Mobile Source Strategy. The draft State Mobile Source Strategy plays a critical role in not only reducing criteria pollutant emissions, but also reductions in greenhouse gas emissions.

The efforts to transition the freight movement sector to zero- and near-zero emission technologies will be challenging without a significant number of commercial products and sustained investment to encourage early deployment of zero- and near-zero emission vehicles. As such, the SCAQMD staff recommends that the proposed 100,000 zero emission vehicle/equipment be significantly increased to a higher target to provide a clear signal to technology providers on the market certainty for near-zero and zero emission technologies to be developed and commercialized as early as possible. Given the population of freight movement related sources, the 100,000 target represents a very small fraction of the overall population of freight-movement vehicles and off-road equipment. The SCAQMD staff believes that at least two to three times as many vehicles/equipment (200,000 to 300,000) is achievable in the 2030 timeframe. The SCAQMD staff stands ready to work with all stakeholders to further deploy zero and near-zero emission vehicles and equipment.

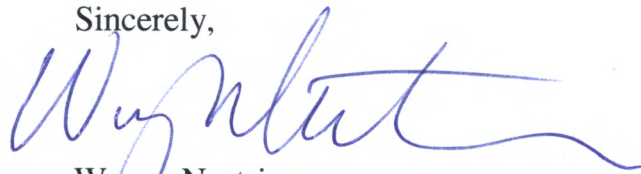
Relative to the development of performance-based criteria to evaluate transportation projects proposed by local agencies and the State, SCAQMD staff urges that a higher

priority be placed on environmental benefits in prioritizing projects. Given the number of other criteria that are considered when projects are evaluated and prioritized for funding, the environmental benefits criteria would be outweighed by the other criteria unless a higher weighted value is established.

Finally, the proposed actions need to be accelerated to provide sufficient lead time for infrastructure development that will encourage greater deployment of zero and near-zero emission vehicles and equipment.

Thank you for considering our comments. We look forward to working with the Interagency Partners as you finalize the draft California Sustainable Freight Action Plan. Please contact me at (909) 396-2100 ([wnastri@aqmd.gov](mailto:wnastri@aqmd.gov)) or Mr. Henry Hogo, Assistant Deputy Executive Officer, Mobile Source Division, Science and Technology Advancement, at (909) 396 3184 ([hhogo@aqmd.gov](mailto:hhogo@aqmd.gov)) if you have questions regarding our comments.

Sincerely,



Wayne Nastri  
Acting Executive Officer

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