



January 9, 2020

Hannah Walter, Associate Deputy Director
California Transportation Commission
1120 N Street
Sacramento, CA 95814

Re: Trade Corridor Enhancement Program Draft Guidelines

Dear Ms. Walter:

The Coalition for Clean Air (CCA) appreciates the opportunity to comment on the Discussion Draft Guidelines for the Trade Corridor Enhancement Program (TCEP). CCA's mission is to protect public health, improve air quality and prevent climate change. Our recommendations follow.

CTC should give much better notice so the public can participate.

As far as we can tell, notice for the January 7 workshop went out after close of business on Friday, January 4, 1 business day before the workshop, making it very difficult for public to participate. CTC needs to do much better at notifying and involving the people affected by its decisions. Notice should go out at least 15 days in advance, preferably 30 days.

Prioritize funding infrastructure for zero-emission or near-zero-emission goods movement.

As the draft California Freight Mobility Plan 2020 notes: "Looking ahead to the year 2040, zero- or near-zero-emissions vehicles and equipment will dominate California's freight system." P. 1.B-2. This transition, which will greatly benefit public health in California and reduce fuel and maintenance costs, will require major investments in new charging and fueling infrastructure.

Therefore, TCEP should prioritize funding for this clean-energy infrastructure. This prioritization will further the objective of TCEP, the goals of the 2020 CA Freight Mobility Plan, and the guiding principles of the CA Sustainable Freight Action Plan, as well as Governor Newsom's Executive Order.

As the draft guidelines state (p.3-4): "The objective of the Trade Corridor Enhancement Program is to fund infrastructure improvements on federally designated Trade Corridors of National and Regional Significance, on California's portion of the National Highway Freight Network, as identified in the California Freight Mobility Plan and along other corridors that have a high volume of freight movement as determined by the Commission. The Trade Corridor Enhancement Program will also support the goals of the National Highway Freight Program, the California Freight Mobility Plan, and the guiding principles in the California Sustainable Freight Action Plan."

Prioritizing zero- and near-zero-emission infrastructure would also fulfill:

- Environmental Stewardship Goal of 2020 CA Freight Mobility Plan (CFMP)

“Support strategies that reduce, avoid and/or mitigate adverse environmental impacts of the freight transportation system while promoting ecological restoration approaches in the planning process.”

- CA Sustainable Freight Action Plan (CSFAP) Guiding Principles

“Invest strategically to accelerate the transition to zero and near-zero emission equipment powered by renewable energy sources, including supportive infrastructure.”

“Apply innovative and green technology, along with accompanying infrastructure and applicable practices, to optimize the efficiency of the freight transportation system.”

“Reduce or eliminate health, safety, and quality of life impacts on communities that are disproportionately affected by operations at major freight corridors and facilities. This includes reducing toxic hot spots from freight sources and facilities and ensuring continued net reductions in regional freight pollution.”

- Governor Newsom’s Executive Order N-19-19

“The State Transportation Agency shall leverage the more than \$5 billion in annual state transportation spending for construction, operations and maintenance to help reverse the trend of increased fuel consumption and reduce greenhouse gas emissions associated with the transportation sector. To accomplish this, the State Transportation Agency, in consultation with the Department of Finance, shall align the state’s climate goals with transportation spending on planning, programming and mitigation to achieve the objectives of the state’s Climate Change Scoping Plan, where feasible.”

Therefore, the guidelines should explicitly spell out eligibility for zero/near-zero-emission infrastructure, such as truck lanes reserved for ZE/NZE trucks; battery-electric charging; hydrogen fueling; catenary systems, etc.

Do not give priority to projects with federal funding (p.7).

Because the federal government is actively obstructing, rather than supporting, CA efforts to clean up transportation, we cannot count on the federal government to fund projects that are best for our state.

Eligibility: Do No Harm – Add Public Health Criteria

We appreciate that eligibility includes projects that “implements technology or innovation to improve the freight system or reduce or avoid its negative impacts; or reduces or avoids adverse community and/or environmental impacts of the freight system.” p. 9.

BUT, eligibility should be restricted only to those projects that reduce or avoid adverse community and/or environmental impacts of the freight system. Californians cannot afford to have our tax dollars used to impose adverse impacts on our communities.

Public health criteria for TCEP should be based upon the fundamental principle that the public should not suffer any increased adverse health impacts as a result of any TCEP project and that existing threats to and impacts upon public health from freight transportation activities

should be minimized and, wherever possible, eliminated. The California Sustainable Freight Action Plan states that an estimated 2,200 Californians die prematurely each year from exposure to freight-related air pollution emissions and that these and other public health impacts from freight activities have a cost of approximately \$20 billion per year. (CSFAP, Appendix G, Table G-2, p. G-7.) CTC should use the same methodology used in the Sustainable Freight Action Plan to calculate public health impacts of all TCEP projects. The California Air Resources Board adopted this methodology as part of its 2010 Truck and Bus rulemaking.*

We agree that “Project must not have the purpose or intent to increase the state’s overall capacity to facilitate the transportation of coal in bulk, pursuant to Government Code Section 14525.3. “ p. 12.

We also agree that “Project contributes to corridor or air basin emission reduction of greenhouse gases, diesel particulates (PM 10 and PM 2.5), carbon monoxide, nitrogen oxides, and other pollutants, and “Project demonstrates that negative environmental/community impacts will be avoided or mitigated.” P.13.

We agree with inclusion of air quality and community impacts in evaluation criteria, p.14, and with the additions on community impacts, p.32.

CTC and ARB must collaborate on evaluating projects.

We commend CTC for its previous collaboration, and recommend changing “may” to “shall” in “The Commission may collaborate with the following state agencies when evaluating project nominations: The Air Resources Board to review the air quality benefits and Caltrans to review the Life-Cycle Benefit-Cost Analysis.” P.14

Respectfully Submitted,



Bill Magavern
Policy Director

*California Air Resources Board, December 2010, Rulemaking to consider the adoption of proposed amendments to the regulation to reduce emissions of diesel particulate matter, oxides of nitrogen and other criteria pollutants from in-use on-road diesel-fueled vehicles, the heavy-duty vehicle greenhouse gas emission reduction measure, and the regulation to control emissions from in-use on-road diesel-fueled heavy-duty drayage trucks at ports and intermodal rail yard facilities, Appendix J, Methodology for estimating ambient concentrations of particulate matter from diesel-fueled engine emissions and health benefits associated with reductions in diesel PM emissions from in-use on-road heavy-duty diesel-fueled vehicles, available at <https://ww3.arb.ca.gov/regact/2010/truckbus10/correctedappj.pdf>.