



March 20, 2020

Chair Paul Van Konynenburg  
California Transportation Commission  
1120 N. Street, MS 52  
Sacramento Ca. 95814

**Re: 2020 Trade Corridor Enhancement Program Guidelines**

Dear Chair Van Konynenburg and Members of the Commission:

The Coalition for Clean Air (CCA) appreciates the opportunity to comment on the 2020 Guidelines for the Trade Corridor Enhancement Program (TCEP). We recognize that some of these recommendations may be difficult to implement in time for the immediate next cycle, but with a three-year long cycle and \$300 million per year in funding, there is no time to wait on protecting our public's health. We are committed to working with the Commission and partners to bring these recommendations to fruition for the TCEP program.

Below are recommendations that Coalition for Clean Air believes would lead to creating a more equitable TCEP process where public health and air quality are prioritized:

**Prioritize funding infrastructure for zero-emission or near-zero-emission goods movement:** We are encouraged by the addition of language that explicitly spells out eligibility for zero/near-zero-emission infrastructure in the eligible projects section. We agree that, "projects that employ advanced and innovative technology to improve the flow of freight, such as Intelligent Transportation Systems (ITS), public infrastructure (excluding vehicles) that enables zero-emission or near-zero emission goods movement," should be eligible in the TCEP program (p. 10.)

While this language brings awareness to this type of infrastructure and its eligibility, we would encourage language that also prioritizes these types of projects. 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, it is not enough to bring only awareness of the eligibility of zero and near-zero technologies, and so the guidelines need specific language prioritizing these types of projects.

**Eligibility: Do No Harm – Add Public Health Criteria**

We are also encouraged to see eligibility includes projects that "implement 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.

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.) 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.

We thank you to the TCEP staff for their willingness to receive feedback and work to better the Trade Corridor Enhancement Program. We are excited to continue to partner with the California Transportation Commission to ensure this program protects public health, improves air quality and prevents climate change.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julia Randolph', with a stylized flourish at the end.

**Julia Randolph**  
Policy and Outreach Associate