Sustainable Freight Advisory Committee

Clean Truck Program Acceleration Recommendation 2.0

This SFAC recommendation is in response to the Port's November 2016 CAAP discussion document and the June 12, 2017 joint declaration on "Creating a Zero Emission Goods Movement Future" by the Los Angeles and Long Beach Mayors.

Zero and near-zero emission technologies are becoming increasingly commercially available in the marketplace and wide scale adoption within and beyond the ports will be required for the region to meet federal Clean Air Act attainment deadlines and provide healthful air for nearby communities. Concurrently, the SFAC recommends the Port continue to work to improve system efficiencies to eliminate unproductive truck moves and lifts where possible.

Given the importance to public health of achieving near-term regional and community air quality goals, the SFAC wishes to reiterate its prior Clean Truck Program recommendation which seeks to replace 100 percent of the existing drayage fleet in the San Pedro Bay Ports with equipment that provides zero and near-zero emissions by 2023, which will be dependent upon an aggressive campaign to provide the necessary public incentives, innovative financing programs, and private capital to ensure that the financial burden of clean technology does not become the sole responsibility of the port truck driver, nor result in cargo diversion due to increased costs of trucking from the San Pedro Bay Ports. It is the goal of the SFAC and should be the goal of the Port and Mayor that the San Pedro Bay Ports are exclusively served by trucks operating with zero tailpipe emissions or meeting the anticipated CARB Ultra-Low NOx emission standard (90% lower than the in-use NOx levels which may equate to 0.02g/bhp-hr NOx) by July 1, 2023.

This bold and aggressive goal is consistent with the South Coast AQMD 2016 Air Quality Management Plan (AQMP) which stresses the dire need for near-term emission reductions and (MOB-08) proposes to replace up to 2,000 heavy-duty trucks per year with ones that meet a 0.02 g/bhp-hr NOx emission level or operate with zero tailpipe emissions.

The achievement of such a goal would provide tremendous air quality improvement within the region and in the communities most impacted by drayage truck emissions.

As previously noted, the SFAC strongly recommends that the Mayor and the Port work aggressively to seek public funding to support the successful implementation of such a goal. Leveraging the reach and influence of the Los Angeles Mayor's Office, the Port of Los Angeles, and the diversity of stakeholders which serve on the SFAC will be critical to successfully advocate for the allocation of

existing and new financial resources from federal, state and local sources to implement this vision by July 1, 2023.

As the necessary public funding is secured and available, the SFAC recommends that the Port update its Clean Truck Program or develop other programs that will ensure the purchase and deployment of trucks that operate with zero tailpipe emissions or meet a 0.02 g/bhp-hr NOx emission level within the San Pedro Bay Port complex. The SFAC recommends that the Port consider the Surplus Off-Road Opt-In for NOx (SOON) provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation as a potential model for such provisions.

While "front loading" the deployment of zero and near zero emission trucks as part of the Clean Truck Program will provide significant air quality and public health benefits, and should thus be the goal of the Clean Truck Program, for a number of reasons, it will be important that this transition be implemented in an even and measured manner between the commencement of the new Clean Truck Program (expected in 2018) and the July 1, 2023 target date.

- Such an approach will allow for the establishment of program milestones and measurement in order to best ensure the success of the program.
- It provides greater certainty to OEMs, technology developers, trucking companies, infrastructure providers, funding agencies, etc., and thus market stability. This will allow for greater investment in the market by all parties.
- It is important that multiple engines are available from multiple manufacturers in order to maintain a competitive market environment and allow drayage truck drivers to select from a range of technologies. A five-year implementation window may provide sufficient time for technology developers and OEMs to develop new technology options to meet the stated program goals.
- The measurement year for the US EPA 2023 8- hour ozone attainment deadline is 2022, therefore, the replacement of the port drayage fleet with units powered by technology operating with zero tailpipe emissions or meeting a 0.02 g/bhp-hr NOx emission level cannot wait until 2023 – significant deployments of zero and near-zero emission technology must occur in the years leading up to 2022. Getting early emission reductions will be critical to protecting and improving public health as well as avoiding Clean Air Act sanctions.
- "Truck manufacturers need to be capable of meeting the market demand for the required volume of trucks and infrastructure / fuel providers must be able to build the necessary stations required to meet the fleet's increasing fueling/charging requirements.
- As is the case with any new advanced automotive technology, there will be certain unforeseen "growing pains." The increased deployment of advanced technologies

during a five-year period will allow for unforeseen technological problems and complications to be appropriately addressed by the manufacturers and/or industry participants. Should insurmountable issues arise, it will provide the opportunity to reassess the Clean Truck Program as necessary.

- Given the significant financial requirements of an advanced technology-based Clean Truck Program, it will be important to spread these financial requirements out over the anticipated five-year period. This will likely allow for greater potential investment of public incentives, as well as private sector capital as the market continues to mature.

It is critical that the capacity and availability of the San Pedro Bay Ports truck drayage fleet be maintained in a "work ready" and competitive state. The SFAC therefore continues to recommend that the Ports focus on developing a series of new measures that will aggressively encourage and incentivize the removal of older and higher emitting trucks from service in order that they are replaced with ultra-low emission and/or zero emission technology over the estimated five-year period.

Any near-term activities should be consistent with the joint declaration of the Los Angeles and Long Beach Mayors.