



June 30, 2015

The Honorable Bob Wieckowski
Chair, Senate Environmental Quality Committee
State Capitol Building
Sacramento, CA 95814

*Wednesday City Council Meeting
Council File
15-0002-S72*

RE: AB 857 (Perea)—Oppose

Dear Chair Wieckowski:

Sierra Club California opposes Assembly Bill 857 (Perea), which would substantially change the California Clean Truck, Bus, and Off-Road Vehicle and Equipment Technology Program.

The bill's proposed changes to the program would severely restrict a substantial portion of the funds appropriated to the program. The restrictions would have the effect of limiting the ability to accelerate commercialization of the cleanest heavy-duty trucks, including electric drayage trucks. As the South Coast Air Quality Management District and the California Air Resources Board have noted over the years as they have tried to address pollution from freight vehicles (rail, marine vessels, and trucks), a key to reducing public health and greenhouse gas emissions from freight movement will be electrification of vehicles, including medium- and heavy-duty trucks that serve ports.

AB 857 would also direct funding intended to reduce greenhouse gas emissions (GHGs) to truck projects without any regard for the projects' impacts on GHGs (including from methane emissions upstream and during fueling). This is despite the fact that there are at least two other programs that provide substantial funding for natural gas trucks, the Carl Moyer Program and the AB 118 fund.

In the end, the bill would appear to favor natural gas trucks over other technologies now and in the future. It would force the state to spend money on trucks that would not provide the greatest near-term and long-term greenhouse gas emissions and criteria pollutant reductions.

On behalf of the Club's more than 150,000 members in California, I respectfully urge your "no" vote on AB 857.

Sincerely,

Kathryn Phillips
Director

CC: Assemblymember Henry Perea, Senate Environmental Quality Committee Members and Staff

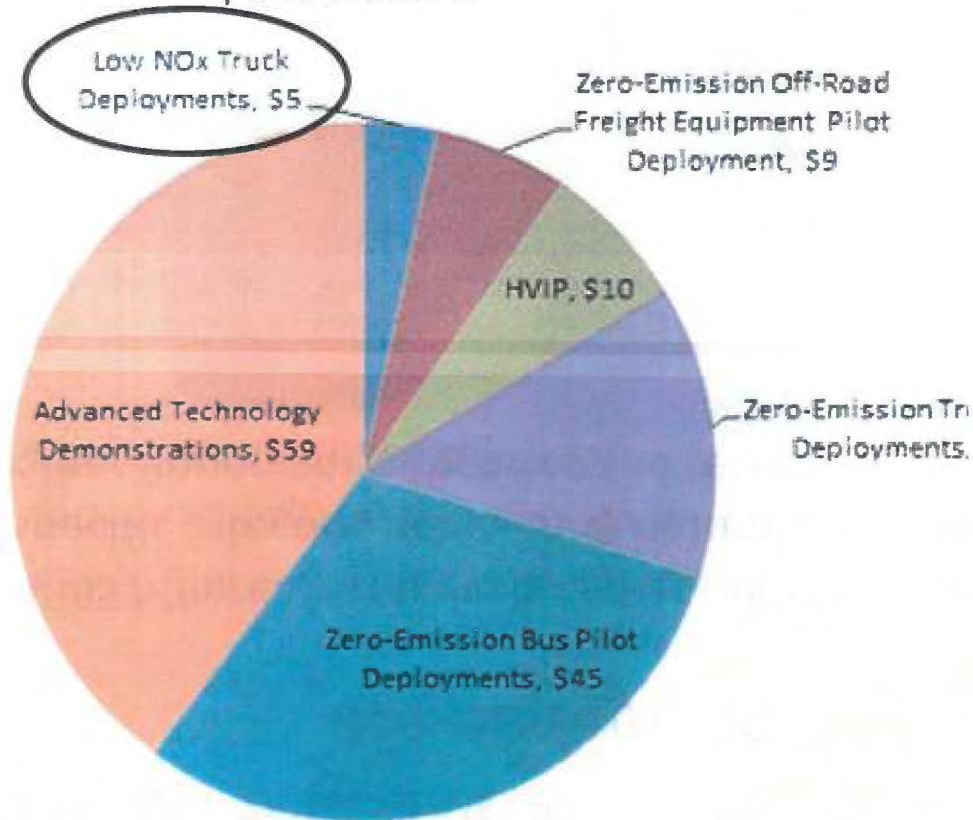
A large and diverse array of technologies and strategies are needed to clean up the sector

AB857 (Perea) effectively carves out funding for one specific technology in one specific category, heavy-duty natural gas engine trucks, pushing out funding for other important categories and technologies.

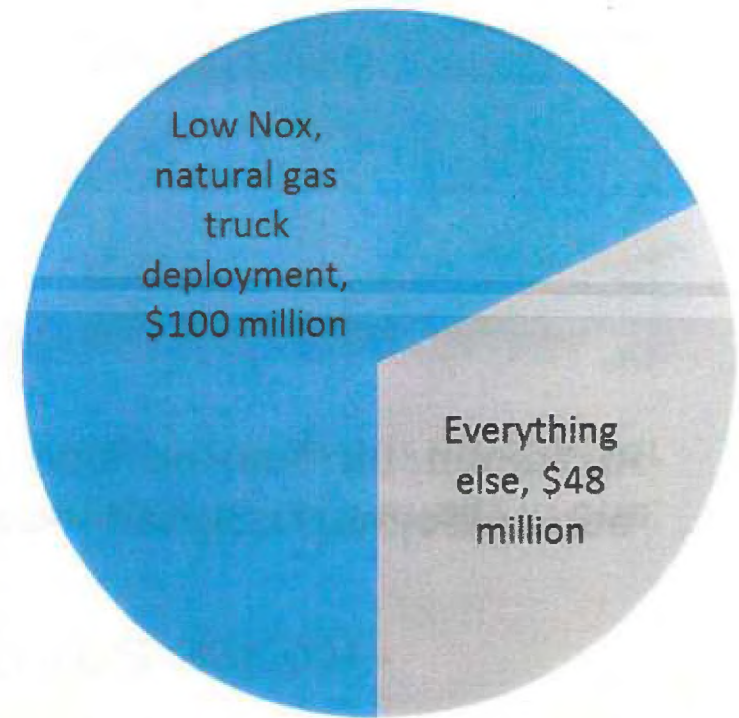


AB 857 would effectively push out other clean technologies and critical funding categories

2015-2016 Funding Plan for SB 1204
\$148 million



Proposed Funding by AB 857 (Perea) if applied to 2015-2016



Agencies and local air districts need flexibility to fund public health and GHG emission reduction strategies in response to changing needs

Table A-14 Mortality Effects Associated with Ports and Goods Movement: Contributions of Source Categories¹ (Uncertainty range in parentheses)

Source Category	2005 Number of deaths	2010 Number of deaths	2020 Number of deaths
Commercial Harbor Craft	140 (41- 240)	120 (35-200)	85 (25-150)
Cargo Handling Equipment	43 (13-73)	38 (11-64)	16 (5-28)
Ocean-Going Ships	210 (63-360)	290 (86-490)	540 (160-910)
Rail (Locomotives)	270 (84-460)	230 (69-380)	290 (89-490)
SoCAB Ports (modeled)	67 (18-120)	75 (20-130)	96 (26-170)
Truck	1,500 (460-2,600)	1,200 (360-2,000)	580 (180-990)
Transport Refrigeration Units	130 (36-220)	99 (29-170)	48 (15-81)
STATEWIDE TOTAL	2,400 (720-,4100)	2,000 (610-3400)	1,700 (500-2,800)

¹ Does not include the contributions from particle sulfate formed from SO_x emissions, which is being addressed with several ongoing emissions, measurement, and modeling studies. Range reflects uncertainty in health concentration-response functions, but not in emissions or exposure estimates.

Caution needed as new studies point to some natural gas trucks increasing GHG emissions

- Estimates by Columbia University/EDF; UC Davis; California Clean Freight Coalition; and ARB show that natural gas trucks can increase GHG emissions in some cases compared to diesel trucks due to lower efficiency, methane leakage, and upstream emissions.
- New proposed federal fuel efficiency standards for medium and heavy duty trucks may increase the efficiency gap between diesel and natural gas trucks.
- Important to ensure future natural gas truck incentive are conditioned on use of biogas from sustainable feedstocks and the most efficient, low NO_x engines.