



July 12, 2021

AB 617 Community Steering Committee (CSC)

Via: Domingo.Vigil@sdcountry.ca.gov

Re: Recommendations for the AB 617 CSC's Consideration Regarding California Air Resources Board's (CARB) Anticipated Advanced Clean Fleet Rule (ACF Rule)

Dear Steering Committee:

We greatly appreciate your leadership to advance environmental justice and air quality. As you know, the Portside Community Emission Reduction Plan (CERP) includes an Advocacy Measures section that was added in order to address rules or actions, such as CARB's ACF Rule, which have the potential to improve air quality in the region. The ACF Rule will, in part, establish the rules to transition diesel drayage trucks (e.g., trucks that pick up cargo from the Port of San Diego) to zero emission by 2035 and will have major implications for the CERP communities. The ACF rule is anticipated to be finalized next year to begin in 2023, and CARB is currently seeking input from communities across the state such as the CSC. Therefore, it is critical for the CSC to ensure that the ACF Rule supports the goals of the CERP and the needs of our communities. EHC and allies from the ACF Coalition are looking forward to presenting the following recommendations on the ACF Rule for your consideration at the 7/20/21 CSC meeting. We are requesting that CSC do the following:

- Take a position on the ACF Rule in support of the recommendations below and send it to CARB.
- Send CSC's position to the APCD Governing Board with a request that they take a similar position.

Recommendations for the ACF Rule

1. Support CARB staff's proposal that all drayage trucks added to the Drayage Truck Registry be ZEV starting in 2023. In addition, support a clarification that all new drayage trucks entering service must be ZEV starting in 2023, including trucks carrying cargo-containers to and from non-port and non-railyard facilities.
2. Require vehicle retirement mandates for all combustion trucks upon reaching SB1 lifetime cap.
3. Expand the number of trucks covered by the rule, such as greater numbers of non-fleet trucks.
4. Address driver misclassification and increase rule compliance.

5. Use “common ownership and control” to define the regulated entity for all fleet types and create a fleet database to ensure implementation.
6. Require fleets prepare and submit ZEV business transition plans, including charging infrastructure plans, to CARB to reduce delays in infrastructure installation.
7. Include a 100% ZEV sales mandate across all truck classes by 2035.
8. Provide support to ports and air districts seeking to achieve more aggressive drayage truck goals, such as the draft Portside CERP’s goal of Medium and Heavy Duty trucks servicing Portside Community to be 100% ZEV 5 years ahead of the California state requirements.

Thank you for your time and consideration. Please contact Danny Serrano/Campaign Director at dannys@environmentalhealth.org for any additional information.

Sincerely,



Danny Serrano
Campaign Director

Sincerely,



Jorge Gonzalez
Regional Organizer

Sincerely,



Joy Williams
Retired Research Director