

February 24, 2022

The Honorable Laura Friedman
California State Assembly
Chair, Committee on Transportation
1021 O St., Room 5740
Sacramento, CA 95814

RE: AB 627 (Jackson) – OPPOSE

Dear Assemblymember Friedman,

The undersigned organizations **OPPOSE** Assembly Bill 627.

California already has the nation's strictest emission standards for diesel trucks. As of 2023, no truck is legally allowed to operate without an EPA2010 or newer model year engine equipped with diesel particulate filters and selective catalytic reduction technology. These emission control systems reduce particulate matter, the pollutant of greatest near-source concern, by 99.9% and smog forming NOx emissions by over 90%. CARB also recently adopted the nation's first smog check program for trucks, which will remove high-emitting, malfunctioning trucks from the road.

According to the California Air Resources Board's EMFAC 2021 model, there are approximately 79,437 commercial vehicles operated exclusively in-state, in the counties of San Bernardino and Riverside. 83% of those vehicles are diesel powered.

Medium-Heavy Duty Trucks Operated Exclusively in California/SB-Riverside Counties by Fuel Type in 2030

<i>Diesel</i>	65,876	83%
<i>Electric</i>	5,122	6%
<i>Gasoline</i>	3,936	5%
<i>Natural Gas</i>	4,503	6%
TOTAL	79,437	

The Counties of San Bernardino and Riverside are major logistics hubs supporting commerce transported to and from the Port of Los Angeles and Long Beach as well as through the state and the rest of North America. Collectively the San Bernardino and Riverside metropolitan areas boasts over 383,000 employees in the logistics, transportation and material moving sectors¹². This bill would put nearly every single one of these jobs at risk as it will not be feasible to base logistics operations from these counties without diesel trucks.

¹ https://www.bls.gov/regions/west/news-release/occupationalemploymentandwages_riverside.htm

² <https://indicators.sbcounty.gov/economy/employment/>

Impact to the counties' residents will be even more severe³:

- Gasoline stations would run out of fuel within a couple days. The average gas station requires a delivery every 2.4 days, meaning the county would run out of fuel by the second week of January of 2030.
- The most vulnerable populations would be at-risk from depleting supplies of life-saving medicine and medical supplies that will be unable to be replenished. According to the National Association of Chain Drug Stores, most of the nation's 55,000 drug stores receive daily deliveries by truck. Hospitals would be deprived of essential basic supplies, such as syringes and catheters.
- Grocery stores would quickly run out of food and will be unable to stock shelves while shipments of agricultural products, including from the region's dairy and egg producers, would come to a halt from a lack of adequate transportation to and from processing plants.
- Supplies to clean the drinking water would be unable to be delivered during this prohibition. Residents of both counties would run out of drinking water from a lack of chemicals being delivered to purify drinking water.
- Inland Empire banks would run out of cash within 2-3 days due to lack of armored vehicle deliveries.
- Construction projects would come to a halt.

AB 627 is also likely preempted by multiple federal laws. The Federal Clean Air Act preempts states from promulgating standards related to new engine emissions⁴. The Federal Aviation Administration Authorization Act of 1994 preempts state laws related to motor carrier prices, routes and services⁵.

Finally, AB 627 proposes an unfunded grant program to help fund a transition away from diesel. Providing HVIP vouchers for the 65,876 trucks in San Bernardino and Riverside County and the associated charging equipment would cost approximately 57x more than the entire State's standard HVIP funding for FY22-23.

For these reasons, we respectfully **OPPOSE** AB 627 (Jackson).

Sincerely,

Will Scott, Jr.
African American Farmers of California

Peter Friedmann
AgTC - Agriculture Transportation Coalition

Richard Matoian
American Pistachio Growers

Lisa Foshee
Auto Care Association

Todd Sanders
California Apple Commission

Victoria Horton
California Beer & Beverage Distributors

Todd Sanders
California Blueberry Association

Todd Sanders
California Blueberry Commission

³ <https://www.trucking.org/sites/default/files/2019-12/When%20Trucks%20Stop%20America%20Stops.pdf>

⁴ 42 U.S.C. 7543

⁵ 49 U.S.C 14501 - Federal authority over intrastate transportation

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California Cotton Ginners and Growers Association

Katie Little
California Farm Bureau

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California Fresh Fruit Association

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