March 25, 2020

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

Re: 2020 Trade Corridor Enhancement Program Guidelines (March 25 Agenda Item 21)

Dear Chair Konynenburg:

We appreciate efforts taken by the staff of the California Transportation Commission (CTC; the Commission) to develop the 2020 Trade Corridor Enhancement Program (TCEP) Guidelines that are being presented to the CTC for adoption on March 25. We are cognizant of the diligent work the CTC staff put forward in collaborating with ports and other trade corridor stakeholders around the state to set regional targets that reflect the importance of goods movement. As the Los Angeles/Inland Empire region is home to the busiest containerized seaport complex in the Western Hemisphere, the Port of Long Beach believes that proposed funding targets in TCEP adequately reflect the scale of our freight-related activities.

The Port of Long Beach (the Port) also commends staff for proposing that projects successful in the 2020 Infrastructure for Rebuilding America (INFRA) Grant awards be programmed TCEP funds prior to adoption of the 2020 Trade Corridor Enhancement Program in December 2020, if the project is otherwise eligible. Doing so allows the Commission to consider taking similar action for other federal discretionary funds. We appreciate the CTC staff recognizing the importance of using our state funding to leverage federal opportunities. Prioritizing federally-funded projects (like INFRA and other federal discretionary freight programs) that also meet TCEP objectives recognizes that freight is not only critical to the State of California but to the nation as well. Delivering and funding such projects require partnership and participation from all levels of government. We look forward to having the opportunity to provide input to staff as they develop a more comprehensive process that looks at all federal discretionary programs and as they analyze potential impacts of funding projects outside of a call-for-projects and evaluation process.

In the meantime, we want to call to your attention options in which the CTC can transform the transportation and goods movement sector while also making positive impacts to the environment and public health. In 2006, the Port of Long Beach, together with the Port of Los Angeles, created and approved the Clean Air Action Plan (CAAP), which provided a strategy for dramatically reducing air pollution emissions from port-related cargo movement in the San Pedro Bay Port Complex. After achieving significant reductions in pollution while seeing record increases in cargo throughput, we reaffirmed our commitment to environmental stewardship...
by creating and adopting a revised CAAP in 2017 that includes a transition to near-zero emission (NZE) trucks in the near term, and transformation to a zero-emission (ZE) truck fleet by 2035.

As the Green Port, we are supportive of the inclusion in the Draft Program Guidelines of funding for infrastructure to support Zero-Emission Vehicles (ZEV), by adding “public infrastructure projects that enable zero emission goods movement” under Project Eligibility (p. 10). Inclusion of charging infrastructure that are publicly accessible and located proximate to a port or designated trade corridor to support trucks and port/goods movement equipment, and hydrogen fueling infrastructure for trucks using such port or corridor is a positive step to advance the widespread deployment of transportation technologies to reduce pollution in California.

We also request that the Commission provide TCEP funding for ZEV pilot and demonstration projects for trade corridors. Projects demonstrating the potential for environmental mitigation of the negative air quality, noise, and other impacts from our freight system on nearby communities should be given strong consideration.

The Port also supports funding for ZE freight and goods movement equipment (off-road equipment such as yard tractors, forklifts, etc.) and the charging infrastructure to support this equipment. In addition, NZE equipment (hybrid rubber tired gantry cranes and top picks that can be retrofit to full ZE in the future) should also be eligible for funding in the near-term. Replacing traditional equipment with ZE and NZE can provide significant environmental mitigation at ports and other freight facilities, offering major community benefits. The California Air Resources Board recently launched the Clean Off-Road Equipment program to incentivize the purchase of ZE off-road equipment, with initial funding of $40 million; however, this funding has already been nearly exhausted. State funding programs such as TCEP could be used to incentivize ZE for ports and freight facilities, and have major beneficial effects on the communities most impacted by our freight system.

We appreciate your consideration of the above comments and concerns related to funding projects that make infrastructure improvements along corridors that have a high volume of freight movement and also reduce air pollution and improve public health in communities most impacted by goods movement in California. If you have any questions, please do not hesitate to contact my office at (562) 283-7080 or mario.cordero@polb.com.

Sincerely,

Mario Cordero
Executive Director