

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

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 sectors<sup>12</sup>. 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.

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<sup>1</sup> [https://www.bls.gov/regions/west/news-release/occupationalemploymentandwages\\_riverside.htm](https://www.bls.gov/regions/west/news-release/occupationalemploymentandwages_riverside.htm)

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

Impact to the counties' residents will be even more severe<sup>3</sup>:

- 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 emissions<sup>4</sup>. The Federal Aviation Administration Authorization Act of 1994 preempts state laws related to motor carrier prices, routes and services<sup>5</sup>.

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**

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

<sup>4</sup> 42 U.S.C. 7543

<sup>5</sup> 49 U.S.C 14501 - Federal authority over intrastate transportation

Matthew Hargrove  
**California Business Properties Association**

Roger Isom  
**California Cotton Ginners and Growers Association**

Katie Little  
**California Farm Bureau**

Ian LeMay  
**California Fresh Fruit Association**

Elizabeth Graham  
**California Fuels and Convenience Alliance**

Steve Weitekamp  
**California Moving & Storage Association**

**California Railroads Association**

Rachel Michelin  
**California Retailers Association**

Craig Baker  
**California Tow Truck Association**

Chris Shimoda  
**California Trucking Association**

Robert Verloop  
**California Walnut Commission**

Rodney Pierini  
**CAWA - Representing the Automotive Parts Industry**

Joani Woelfel  
**Far West Equipment Dealers Association**

Ken O'Brien  
**Fashion Accessories Shippers Association**

Nicole Uchrin  
**Gemini Shippers Association**

George Goldman  
**Greenabl Shippers**

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**San Gabriel Valley Economic Partnership**

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Isabel Fontanals  
**The Fashion Jewelry and Accessories Trade Association**

Jake Jacoby  
**Truck Renting and Leasing Association**

John Szczepanski  
**U.S. Forage Export Council**

Roger Isom  
**Western Agricultural Processors Association**

Renee Pinel  
**Western Plant Health Association**

Lee Brown  
**Western States Trucking Association**