



Todd R. Campbell

Vice President, Public Policy and Regulatory Affairs

March 11, 2026

Mr. Wayne Nastri, Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Dr. Noel Hacegaba
Chief Executive Officer
Port of Long Beach
P.O. Box 570
Long Beach, CA 90801

Mr. Gene Seroka
Executive Director
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, CA 90731

Re: New Mitigation Measures designed to Complement the current South Coast AQMD Cooperative Agreement with the Ports of Long Beach and Los Angeles.

Dear Mr. Nastri, Dr. Hacegoba, and Mr. Seroka, and collective staff:

First, thank you for your joint leadership in forming the Cooperative Agreement between each of your organizations. Working together, the South Coast AQMD, the Port of Long Beach (PoLB), and the Port of Los Angeles (PoLA) will be collectively addressing port-related pollution together with the recognition that our regional ports and related goods movement system is a critical economic engine for the Southern California region.

Heavy-Duty Diesel Truck Pollution Must Be Addressed

While the Cooperative Agreement rightly prioritizes the development of zero-emission infrastructure at the ports, adding a new mitigation measure that can effectively address the pollution impacts generated by today's regional and interstate heavy-duty diesel trucks in the near- to mid-term is critical. Heavy-duty diesel trucks in the class 7-8 tractor class are the largest single source of pollution in the South Coast Air Basin and remain "hard-to-electrify".

Clean Energy

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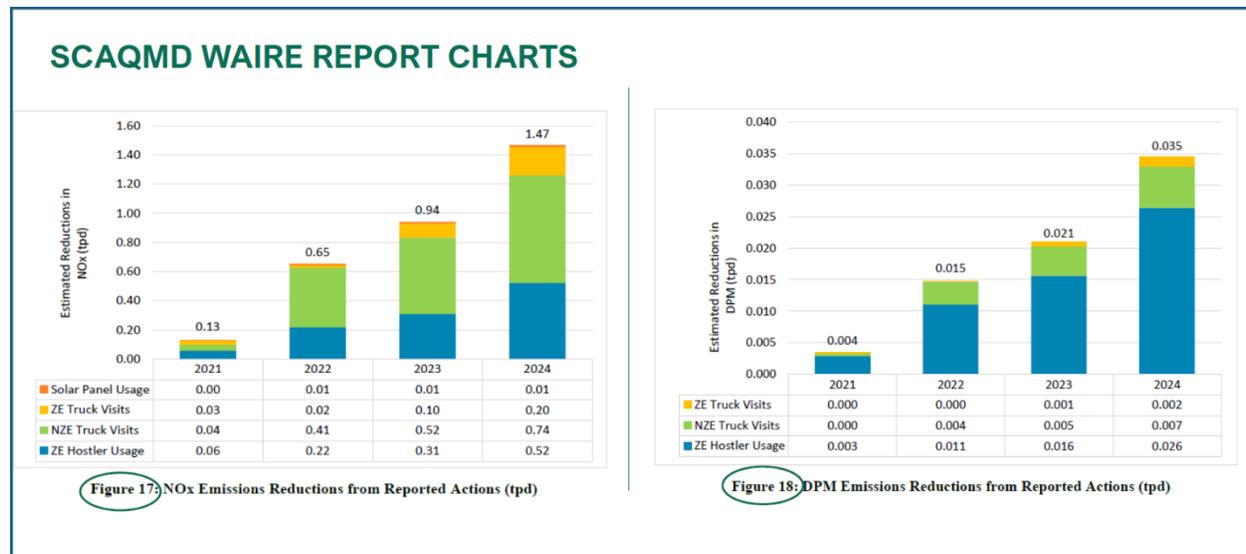
CleanEnergyFuels.com



Meanwhile, Near Zero Emission (NZE) also called cleanest combustion trucks are an effective and immediate way to address this problem as demonstrated by the 3rd Annual Report for the Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program report published in January 2026.

WAIRE Data Demonstrates the Effectiveness of Near Zero Emission Trucks

Specifically, NZE trucks certified to California’s 2010 Heavy-Duty Truck regulation’s optional low NOx standard at 20mg (0.02g) remain the leading driver of NOx emissions reductions under the WAIRE program to date. Even though this strategy was only allowed to participate in the WAIRE program for 7 months before being removed from WAIRE when CARB replaced the 2010 standard with the Heavy-Duty Omnibus Regulation (Omnibus) on January 1, 2022, NZE trucks have accounted for over half of the program’s total NOx emissions reductions for the last 3 years.



Federal Repeal of CARB’s Omnibus Rule Makes NZE Mitigation Option Critical to Public Health

With the federal government’s invalidation of California’s Omnibus rule and California’s 2010 model year truck standards, California fleets can legally purchase 200mg (0.2g) NOx trucks and operate them for up to 18 years per Senate Bill 1 passed in 2017. US EPA’s version does not include the 20mg (0.02g) optional low NOx standard that WAIRE once relied upon. This situation literally opens up the flood gates for fleets to purchase new diesel trucks that meet a



minimal standard that was established 16+ years ago with no policy signal to regional or inter-state fleets to purchase cleaner combustion options that are available on today's market.

Proposed NZE Mitigation Option for the Joint Cooperative Agreement

We strongly recommend that the South Coast AQMD and the San Pedro Bay Ports incentivize the operation of cleanest combustion trucks at the San Pedro Bay Port Complex moving forward. This can be achieved by setting a NZE emissions target based on an engine's certified Family Emission Limit (FEL). For example, the Joint Cooperative Agreement can incentivize NZE trucks to operate in the Ports and the regional goods movement system that meet a FEL set at 50mg (0.05g) or 35mg (0.035g) NOx. Such an action would help prevent the purchase of new 200mg (0.2g) diesel engines within the South Coast Air Basin and deliver tangible and much needed protections to our most impacted communities.

Omnibus certified engines are functionally equivalent to engines previously certified to the 20mg Optional Low NOx standard

For example, the Cummins L9N engine was certified to the 20mg (0.02g) Optional Low NOx standard under California's 2010 emission regulations. Following implementation of Omnibus in California, that same L9N engine was certified to 50mg (0.05g) NOx. Cummins natural gas engines are being voluntarily certified under Omnibus, even today.

The 2024 Omnibus regulation was appropriately titled because it instituted much stricter low-load and real-world testing requirements. From a practical perspective, only natural engines have been able to meet at commercial volumes. At this time, engines certified at or below 50mg (0.05g) NOx under Omnibus are truly the cleanest combustion engines available anywhere in the world. Hence, incentivizing trucks that meet a stricter FEL standard at Omnibus or lower levels prevents 200mg (0.2g) engine operations that meet overall stricter standards.

Adopting a NZE Mitigation Option is Good Public Policy for the South Coast

Adopting a NZE mitigation option based on a FEL at or below 50mg (0.05g) NOx not only will help improve overall air quality from trucks operating throughout our region's goods movement system (i.e., ports, warehouses, other goods movement destinations), it also supports those engine manufacturers and fuel providers who made the necessary investments to support the state's clean heavy-duty truck standards. Making the transition to a zero emission future will take time. California's policies for ZEV light-duty passenger cars started in the early 1990s and, 36 years later, ZEV passenger car sales accounted for a little over 20% of total new car sales. Much like the light-duty sector, California and other region's throughout the country will need clean combustion strategies for the next several decades.



Conclusion

If the South Coast Air Basin is to ever achieve clean air attainment with the federal Clean Air Act standards, we must strive for a zero emissions future and encourage the cleanest combustion options available to us when electrification cannot meet our regional trucking needs. We therefore strongly urge the AQMD Board and our Port Authorities to embrace a heavy-duty truck mitigation strategy in its Joint Cooperative Agreement that all port, warehouse and goods movement operators can participate in.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd R. Campbell", with a long, sweeping horizontal line extending to the right.

Todd R. Campbell
VP, Public Policy & Regulatory Affairs