DOCKETED	
Docket Number:	25-ALT-01
Project Title:	2025–2026 Investment Plan Update for the Clean Transportation Program
TN #:	265624
Document Title:	Micah Mitrosky Comments - CSAEW Letter With Allied Orgs
Description:	N/A
Filer:	System
Organization:	Micah Mitrosky
Submitter Role:	Public
Submission Date:	8/15/2025 3:53:30 PM
Docketed Date:	8/15/2025

Comment Received From: Micah Mitrosky

Submitted On: 8/15/2025 Docket Number: 25-ALT-01

## **CSAEW Letter With Allied Orgs**

Additional submitted attachment is included below.

California Energy Commission 715 P Street Sacramento, CA 95814 August 13<sup>th</sup>, 2025

## Re: Prioritizing Freight Corridor Electrification and Equity in Clean Transportation Program Investments

Dear Chair Hochschild, Commissioners, and Policy Staff

Thank you for your continued leadership in advancing California's clean transportation future. The California Energy Commission's (CEC) Clean Transportation Program (CTP) has been instrumental in expanding access to zero-emission vehicle (ZEV) infrastructure and reducing pollution in communities across the state. At a time of constrained public resources and shifting federal policy, the CEC's investment strategy remains essential to achieving both climate and equity goals.

As the Commission prepares to allocate the next round of CTP funding, we urge you to prioritize and align funding decisions with Senate Bill 671 (Gonzalez, 2023) and the CEC's *Clean Freight Corridor Efficiency Assessment*. Together, these tools offer a clear framework for deploying infrastructure where it will have the greatest impact – along high-traffic freight corridors and in communities most burdened by freight-related emissions.

We respectfully recommend that the Commission prioritize CTP investments in the high-traffic freight corridors identified in the *Clean Freight Corridor Efficiency Assessment*, with a particular focus on disadvantaged and disproportionately impacted communities adjacent to these corridors.

This approach will fulfill the intent of SB 671, expand access to charging infrastructure, lower barriers for small fleets and independent operators, and ensure public investments deliver tangible health, climate, and affordability benefits.

## **Maximizing Impact Through Strategic Investment**

Focusing CTP funds on the state's busiest freight corridors – and the disadvantaged communities and Tribal Nations most affected by them – will ensure California's limited public dollars deliver the highest possible value. This strategy not only reduces emissions and supports equitable access but also aligns with legislative mandates and real-world infrastructure needs.

Advancing Environmental and Health Justice: Communities near freight corridors
face disproportionate exposure to diesel emissions and toxic air pollution. Prioritizing
charging infrastructure in these areas helps address historic inequities and delivers
immediate public health benefits. It also expands access to battery electric technology
solutions for small fleet operators and independent drivers who often face barriers to
participating in the clean transportation transition.

- Aligning with State Law and Policy: SB 671 and the *Clean Freight Corridor Efficiency Assessment* provide a clear policy roadmap for reducing emissions and supporting freight efficiency. Aligning investments with these tools ensures consistency with state law, planning frameworks, and emissions reduction commitments.
  - This approach also supports proactive utility planning. For example, LADWP the nation's largest municipal utility— must anticipate and integrate freight charging needs into its distribution system plans. Coordinating infrastructure deployment with grid upgrades is essential to energizing chargers on time and at scale.
- Ensuring Cost Effective, High Impact Investments: High-traffic freight corridors offer the greatest return on investment. These locations support higher utilization, greater emissions reductions per dollar spent, and shared-use models that lower costs for users. Prioritizing these corridors ensures California's investments are efficient, equitable, and capable of accelerating battery electric vehicle (BEV) adoption across vehicle types.
- Maintaining Momentum Amid Federal Uncertainty: Delays and disruptions to federal programs like NEVI highlight the importance of stable, state-led action. CTP investments can sustain momentum, ensure continuity, and position California to capitalize on future federal opportunities. Strategic state funding now can serve as both a bridge and a backstop—preventing project slowdowns and enhancing infrastructure readiness.

## **Delivering Broader Economic and Social Benefits**

Investments in high-traffic freight corridors generate good paying-jobs in construction, operations, and maintenance – often in communities that have borne the brunt of environmental harm. Strategically located charging hubs can serve multiple transportation needs, supporting freight, light-duty vehicles, transit fleets, and shared mobility. This integrated approach increases infrastructure utilization and improves public access to charging, especially in areas where home or depot charging is not yet feasible.

Widespread transportation electrification also helps lower long-term fuel costs for households and businesses. By expanding public access to charging and enabling affordable participation in the zero-emission transition, these investments contribute to a more inclusive, efficient, and resilient transportation system.

California has the policy direction, analytical tools, and urgent need to deploy infrastructure where it can do the most good. Prioritizing high-traffic freight corridors will reduce emissions, expand access, and lower cost barriers to clean transportation. We appreciate your continued leadership and welcome the opportunity to work with the Commission to ensure infrastructure investments deliver on California's climate, equity, and affordability goals.

Sincerely,

Beth Hammon Natural Resources Defense Council

Peter M. Warren San Pedro & Peninsula Homeowners Coalition

Román Partida-López The Greenlining Institute

John Doherty CA State Association of Electrical Workers

Katelyn Roedner Sutter Environmental Defense Fund Guillermo A. Ortiz Natural Resources Defense Council

Theral Golden West Long Beach Association

Sam Wilson Union of Concerned Scientists

Darryl Little Jr. CALSTART