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Docket Number:	18-ALT-01
Project Title:	2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program
TN #:	229356
Document Title:	Earthjustice Comments on Letter Re 2019-2020 Vehicle Investment Plan Update
Description:	N/A
Filer:	System
Organization:	Earthjustice
Submitter Role:	Public
Submission Date:	8/9/2019 4:06:02 PM
Docketed Date:	8/9/2019

*Comment Received From: Earthjustice
Submitted On: 8/9/2019
Docket Number: 18-ALT-01*

Comment Letter Re: 2019-2020 Vehicle Investment Plan Update

Additional submitted attachment is included below.



August 9, 2019

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814

Re: Docket No. 18-ALT-01; Advisory Committee Meeting; 2019-2020 Vehicle Investment Plan Update

Dear California Energy Commissioners:

On behalf of the undersigned, we submit the following comments in response to the California Energy Commission's (CEC) proposed 2019-2020 Vehicle Investment Plan Update. This comment letter provides input on the three questions raised by Commissioner Monahan at the Advisory Committee Meeting and Public Workshop for the Clean Transportation Program held on Monday, August 5, 2019. Our organizations are in favor of the Plan's increased investments in zero-emission vehicles and charging infrastructure, are strongly encouraged that CEC is moving towards a better balance of investments for achieving a zero-emission California, and strongly support Commissioner Monahan's commitment to strengthen equity in the Plan.

1) Overall Approach: Focus on Zero-emission Transportation

We support the Plan's increased investments and focus on zero-emission vehicles and infrastructure, and are especially happy to see that the new plan commits \$62.7 million to light-, medium- and heavy-duty zero-emission infrastructure. As California finds itself amidst a climate crisis, struggling with some of the dirtiest air in the nation, only the most innovative and truly zero-emissions technologies will allow us to reach our goals and improve life for all Californians. To this end, our organizations would like to see even more of the Plan's funding go toward zero-emission vehicles and infrastructure.

2) Zero-emission Infrastructure Priorities

The Plan should prioritize zero-emission projects in the ports and freight/logistics industry amongst other priority areas. These sectors are saturated with harmful air pollution that disproportionately affects low-income communities of color. We need immediate and substantial investments in zero-emission charging infrastructure targeted in these sectors, and the Plan's nimbleness and focus on innovation makes it perfect to support this transition.

Moreover, given the advancement of zero-emission vehicles in many jurisdictions in the region, CEC should consider incorporating multi-jurisdictional electric vehicle planning for the freight/logistics sector. As regions like the Los Angeles/Inland Valley region seek to advance zero-emission vehicles, this requires many agencies and other entities working together to advance this zero-emissions vision. The CEC is well-positioned to support thoughtful and inclusive plans to organize electric vehicle infrastructure in California.

3) Equity and Advisory Committee

The Advisory Committee could benefit from broader equity perspectives that are more reflective of California's diversity. As the CEC is aware, ambitious climate solutions must acknowledge and address the legacy of pollution and the reality that communities of color are overburdened by environmental harms. To this end, we recommend including other equity and environmental justice representatives to the advisory committee.

Additionally, we support the continued involvement of the Disadvantaged Community Advisory Group in providing recommendations to the CEC on the Clean Transportation Program.

Likewise, the Committee could benefit from the inclusion of more end-users focused on electric vehicles, particularly as the State doubles down on its commitment to zero-emission vehicles of all types.

Sincerely,

Yasmine Agelidis
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The Greenlining Institute

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