

**DOCKETED**

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<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
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**Pre-Solicitation Concepts for Medium and Heavy-Duty Zero-Emission Vehicles and Infrastructure**

*Additional submitted attachment is included below.*



November 8, 2019

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 19-TRAN-02  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[DOCKET@energy.ca.gov](mailto:DOCKET@energy.ca.gov)

**Re: Pre-Solicitation Concepts for Medium and Heavy-Duty Zero-Emission Vehicles and Infrastructure**

Dear CEC Vehicle Staff:

On behalf of Earthjustice, we submit these comments on the Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure solicitation concepts. At the outset, we commend the California Energy Commission (CEC) on its focus on zero-emissions vehicles in the medium- and heavy-duty space. Infrastructure planning and support for our zero-emission future is critical to protecting communities from deadly air pollution. The following sections provide some thoughts on four concepts presented.

- Concept #1 – We applaud the Commission for focusing on zero-emissions in the freight sector. There is major need in this category given the serious impacts the freight industry has on Californians. Moreover, focusing on infrastructure makes sense for the Commission given other programs focusing on actual vehicle deployments.
- Concept #2 – The Commission should make clear that funding in this category includes electric refuse truck infrastructure.
- Concept #3 – This concept is critical to advancing zero-emissions. The Commission should also encourage multi-jurisdictional applications given that planning needs to take place region-wide to advance zero-emissions. We encourage the Commission to build upon the success at the Port of Long Beach by supporting other seaports, including the Ports of Los Angeles and Oakland, in this work. In addition, cities also need support for zero-emission refuse truck planning as they begin exploring conversion of their refuse truck fleets to zero-emissions.
- Concept #5 – This category touches upon several critical issues. In particular, freight highway corridors and rail lines need to be electrified to clean up California's notoriously polluted air. Earthjustice appreciates the specific reference to the I-710, but any funding provided to agencies working on corridor projects should ensure that community and

environmental groups are engaged with the project applicants to make sure the money is appropriately spent.

We appreciate your consideration of these comments, and we look forward to continued work with the Commission on this vital issue of zero-emission transportation.

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is written in a cursive style with a long, sweeping underline.

Adriano L. Martinez

Yasmine Agelidis