

**DOCKETED**

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**Sierra Club California Comments on the 2020-2023 Investment Plan  
Update for the Clean Transportation Program**

*Additional submitted attachment is included below.*



March 24, 2020

Docket: 19-ALT-01  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**RE: Sierra Club California Comments on the 2020-2023 Investment Plan Update for the Clean Transportation Program**

Dear Commissioners and Staff:

On behalf of Sierra Club California and its nearly 500,000 members and supporters in California, I appreciate the opportunity to provide comments on the California Energy Commission's 2020-2023 Investment Plan Update for the Clean Transportation Program.

Sierra Club California strongly supports the Energy Commission's Clean Transportation Program. We support the funding allocations that will spur deployment of zero-emission vehicles (ZEV) and infrastructure. I submit the following comments to ensure that the Clean Transportation Program prioritizes investments that help all Californians breathe cleaner air and live in a more sustainable environment.

**A. Sierra Club California supports the Energy Commission's commitment to inclusion, diversity, equity and access.**

Given that residents of disadvantaged and low-income communities disproportionately experience the pollution burdens and negative health impacts from the transportation sector, it's critical that the Clean Transportation Program's investments focus substantial resources on these communities. The plan notes on page 4 that, when statewide and sites without a specific address are excluded from the funding pie, about 50 percent of distributed funds are used in low-income or disadvantaged communities. We support the continued effort to focus at least half of the funding on low-income and disadvantaged communities that are hardest hit by emissions from transportation, particularly pollution associated with moving freight.

**B. Sierra Club California requests that the Energy Commission move 100 percent of the Clean Transportation Program funding toward zero-emission technologies.**

Despite California's efforts to implement low-carbon transportation options, emissions from the transportation sector are still moving in the wrong direction. We need more aggressive action to

improve air quality in California's most polluted regions and at the pace required to address the urgency of the climate crisis.

Sierra Club California recommends that all of the projects included in the Clean Transportation Program move California toward ZEV adoption. This is the most effective strategy for reducing criteria air pollutants and greenhouse gas emissions from the transportation sector.

The draft Investment Plan Update outlines funding allocations for natural gas and biofuels. Methane, the main component of natural gas, is a powerful pollutant and brings with it serious implications for public health and climate change. California should not consider natural gas as an appropriate investment as it would prop up polluting infrastructure, which is often sited in disadvantaged and low-income communities. Biofuels are also concerning because they are not emissions-free and their use in combustion engines continue to contribute to climate and localized air pollution.

Funding natural gas infrastructure and biofuel production would hinder California's efforts for achieving the state's critical air quality and climate goals. The state should not invest in stopgap measures to the detriment of our communities, particularly disadvantaged and low-income communities.

In 2019, the Public Utilities Commission and the Energy Commission's Disadvantaged Communities Advisory Group commented that the Clean Transportation Program should allocate 100 percent on zero-emission fuels. Sierra Club California strongly agrees with this prioritization.

**C. Sierra Club California supports the light-duty funding allocations aimed at accelerating the state's transition to ZEVs.**

The Clean Transportation Program's light-duty vehicle allocations are critical to ensure ZEVs are more accessible for all Californians, especially those in disadvantaged and low-income communities.

Establishing a robust charging infrastructure network across California is especially important as we see the number of ZEVs on the road increasing faster than charger installations. The Energy Commission's analysis shows that California must install at least 80,000 chargers by 2025 to meet our goals in Executive Order B-48-18. This directive calls for 250,000 charging ports to support 1.5 million ZEVs, which we are on track to achieve.

Charging infrastructure dollars for light-duty vehicles should be particularly directed at closing gaps in infrastructure to help alleviate "range anxiety" that might discourage some consumers from purchasing a new or used electric vehicle.

**D. Sierra Club California supports the multi-year approach for medium- and heavy-duty vehicle funding allocations.**

Zero-emission battery-electric trucks are technically and economically feasible in many

applications today. The market is expected to grow significantly in the next few years. It is essential that the Clean Transportation Program fund sufficient charging infrastructure to meet the widespread adoption of medium- and heavy-duty battery-electric vehicles.

The multi-year approach included in the Clean Transportation Program is an effective way to signal the Energy Commission's commitment to supporting the transition to zero-emission trucks over the next three years. It also demonstrates a commitment that is aligned with the California Air Resources Board's Innovative Clean Transit Regulation, the upcoming proposed Advanced Clean Trucks Regulation and the anticipated truck fleet rule.

**E. Sierra Club California recommends that the Clean Transportation Program include funding for school bus replacements.**

Ensuring that school children are riding in cleaner, quieter electric buses rather than fossil-fueled buses will improve overall air pollution exposure among school children. According to the draft investment plan, school districts submitted grant applications for six times as many electric school buses than were awarded. It is essential that the Energy Commission expand its efforts to meet the demand for zero-emission school buses.

Electrifying school buses has several benefits beyond health and the environment. Vehicles, like school buses, that follow a fixed route and are parked during the day are best suited for electrification. As California increases solar and wind energy to the grid, this intermittent renewable energy could lead to overgeneration during the day. Electricity demand management can reduce the negative effects of overgeneration and offer significant cost savings—a win-win for both the utility and the school district.

In summary, Sierra Club California supports the Clean Transportation Program's commitment to accelerating ZEV deployment to achieve California's public health and climate goals. The state should prioritize zero-emission transportation options to ensure all Californians experience the health benefits.

Thank you for the opportunity to provide comments on the draft Investment Plan Update for the Clean Transportation Program.

Sincerely,



Katherine Garcia  
Policy Advocate