

DOCKETED

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POLB Comment Letter on the CEC EV Blueprint Concept

Additional submitted attachment is included below.



April 16, 2020

Katie Herter
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Submitted electronically to:

<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=19-TRAN-02>

Re: Port of Long Beach Comments on the “Blueprints for MD/HD ZEVs and ZEV Infrastructure” Draft Solicitation Concept (19-TRAN-02)

Dear Ms. Herter,

Thank you for the opportunity to submit comments on the draft concept document for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure Blueprints funding. The Port of Long Beach (POLB) strongly supports the efforts of the California Energy Commission (CEC) to provide funding for planning efforts to support the transition of on- and off-road fleets to zero-emission. As I am sure you are aware, POLB completed a CEC-funded Port Community Electric Vehicle (EV) Blueprint (EV Blueprint) in 2019 to support the zero-emission goals laid out in the San Pedro Bay Ports 2017 Clean Air Action Plan (CAAP) Update. The EV Blueprint identified terminal-specific blueprints or infrastructure master design plans to identify the zero-emission infrastructure requirements in finer detail than was possible with the Port-wide EV Blueprint as the next major step towards ZE operations. While the upcoming blueprints solicitation would be ideal for funding these terminal-specific master infrastructure plans, there are several proposed requirements, namely the community needs assessment and workforce development strategy, which would be challenging for a blueprint of this nature.

As described in the EV Blueprint, the terminal-specific infrastructure master plans would include engineering designs, construction plans, and comprehensive financing strategies that greatly enhance a project’s chance of near-term execution and long-term sustainability. There are almost no ways to finance a master plan as an end deliverable; thus, public funding, particularly from the CEC, would play a critical role. A thoughtful master plan identifies all potential risks and provides clarity on the return-on-investment in the near term, thus attracting private investors in the mid- to long-term to execute the plan

and deploy the infrastructure and equipment. Such plans for a port terminal are estimated to cost \$500,000-\$1,000,000.

In regards to the proposed community needs assessment requirement, the POLB EV Blueprint relied heavily on stakeholder input, having established a broad stakeholder advisory group of environmental justice and community-based organizations, labor and workforce development groups, technology developers, major manufacturers (OEMs), utilities, terminal operators, trucking companies, charging station manufacturers, hydrogen fuel providers, regulatory agencies, and finance organizations. Bringing the community into this process was appropriate given that the Port's impacts extend beyond its perimeter and the Blueprint needed to consider the possible impacts on and benefits to adjacent residential, commercial, and industrial areas. However, a terminal-specific infrastructure master plan would be an exhaustive engineering analysis on the infrastructure, safety requirements, physical layout and operational management for zero-emissions terminal equipment. This type of analysis necessitates a different type of stakeholder advisory group; one that is focused on the technical and operational needs of the terminal. Given that these terminal infrastructure design plans will build upon the EV Blueprint, the Port requests the upcoming blueprint solicitation be crafted such that community engagement is not required if the applicant can demonstrate that a community needs assessment has previously been conducted as part of a broader planning effort.

Similarly, to support the EV Blueprint, the Port worked with California State University, Long Beach to project workforce development impacts and identify the necessary career pathways to support the transition to zero-emissions. While a terminal-specific blueprint would certainly consider the workforce changes required by a transition to zero-emission, these considerations would be specific to the terminal and its operations. As such, the Port requests that the workforce development requirements of the upcoming blueprint solicitation allow for fleet-specific consideration of workforce development, rather than requiring the applicant work with community colleges to develop strategies for training and education of the local community workforce.

The Port appreciates the CEC's commitment to funding zero-emission infrastructure design and construction projects as the state moves towards its ambitious greenhouse gas and carbon neutrality goals. Planning blueprints are particularly valuable and needed at all levels: state, regional, local, and fleet. By crafting the proposed solicitation to allow smaller entities such as terminal and fleet operators to benefit from this funding opportunity and engage in the detailed design process that is necessary to transition to zero-emission, the CEC will be taking a significant step forward in helping the state, cities, and Ports meet their zero-emission goals. We appreciate the opportunity to provide comments on the proposed blueprints solicitation and look forward to continuing to work with you on advancing our shared clean air goals.



If you have any questions about any of these comments, please e-mail Morgan Caswell, Manager of Air Quality Practices at morgan.caswell@polb.com or call her at (562) 519-2807.

Sincerely,

Matthew Arms
Acting Director of Environmental Planning
Port of Long Beach