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**Port of Long Beach - Comments on 2021-2023 Investment Plan
Update for the Clean Transportation Program**

Additional submitted attachment is included below.



May 14, 2021

Commissioner Patty Monahan
1516 Ninth Street, MS-33
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Submitted electronically to:

<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=21-ALT-01>

Subject: Port of Long Beach Comments on the 2021-2023 Investment Plan Update for the Clean Transportation Program (TN#: 237549)

Dear Commissioner Monahan and Clean Transportation Staff:

The Port of Long Beach (Port) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) 2021-2023 Investment Plan Update for the Clean Transportation Program. The Port commends the CEC on a well-informed and thoughtful investment plan. This plan directly supports the San Pedro Bay Ports 2017 Clean Air Action Plan (CAAP) Update, which set ambitious zero-emissions (ZE) goals, including ZE cargo handling equipment by 2030 and ZE heavy-duty trucks serving the Ports by 2035.

The Port offers the following comments on the 2021-2023 Investment Plan Update for the Clean Transportation Program:

Commitment to Inclusion, Diversity, Equity, and Access in Low-Income and Disadvantaged Communities

The Port applauds the CEC's commitment to inclusion, diversity, equity, and access, ensuring that all Californians have a fair and equal opportunity to participate in and benefit from funding programs and services. Furthermore, the Port is supportive of the CEC commitment to provide 50 percent of Clean Transportation Program funds towards low-income and disadvantaged communities (DACs).

The Port of Long Beach is the second busiest port in the United States providing economic benefits and supporting jobs at the local, regional, state, and national levels. The Port's robust economic activity, however, has an impact on the communities surrounding these operations. Goods movement in California generates elevated levels of local air pollution that disproportionately impacts nearby communities. These communities endure a wide variety of adverse environmental

conditions—many of them port- and freight-related—leading to asthma and cardio-pulmonary diseases, which are exacerbated by poverty and underemployment typically found in DACs. The Port strongly supports CEC’s mission to increase participation of disadvantaged and underrepresented communities.

Funding for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

The Port strongly supports the CEC’s focus to boost the supply of medium- and heavy-duty zero-emission vehicles (ZEVs), and the related electric charging and hydrogen refueling infrastructure within the California goods movement sector. The Port agrees with the 2021-2023 Investment Plan Update that the Clean Transportation Program is a critical source of infrastructure funding and narrowing the infrastructure gap for medium- and heavy-duty vehicles is a priority. While we recognize the CEC is trying to balance other priorities, we respectfully request the CEC preserve the allocation for medium- and heavy-duty vehicles and infrastructure.

Critical Need for Infrastructure Planning Dollars

Through the Port’s Electric Vehicle Blueprint, funded by the Clean Transportation Program, the Port identified terminal-specific infrastructure master plans as the critical next step towards zero-emissions terminal operations. The CEC released a grant funding opportunity for electric vehicle infrastructure blueprints targeting medium and heavy-duty vehicles in the last year and received 44 applications totaling \$13.9 million in requested funding. This supports the notion that infrastructure planning is in high demand throughout California and will be critical to ensuring strategic, cost-effective vehicle deployments that limit stranded assets and ensure resiliency. We continue to encourage the CEC to allocate funding for planning.

Collaboration with the California Air Resources Board on Funding for Medium- and Heavy-Duty Zero-Emission Demonstration Projects

The CEC should continue to coordinate with the California Air Resources Board on their funding priorities and identify ways to streamline grant funding opportunities through joint solicitations. A joint solicitation such as the “Zero-Emission Drayage Truck and Infrastructure Pilot Project,” through which the CEC allocated funding for zero-emission drayage truck infrastructure and CARB allocated funding for the purchase of heavy-duty zero-emission trucks proved successful. The Port recognizes the huge learning curve both the CEC and CARB had experienced during the development process; however, the effort and end result were well-received amongst Port and fellow stakeholders when the solicitation was finally released in November 2020. Pooling funds in this way also allows enables larger projects which may have been missed if only one agency released a solicitation for demonstration of a specific technology.

Hydrogen Fuel Cell Technologies for Port Equipment and Marine Applications.

Like the CEC, the Port recognizes the important role hydrogen fuel cell technology will play in zero-emissions terminal operations, particularly for heavy-lift equipment such as top handlers. However, few demonstrations have taken place across California seaports. We would like to encourage the CEC to allocate a portion of the Clean Transportation Funding to demonstration projects, including hydrogen fuel cell cargo handling equipment projects.

Workforce Training and Development.

Lastly, the Port strongly supports the CEC's commitment to workforce development. With the projected rise of ZEVs, the Port expects to see a demand for skilled current and future workers, and short-term training for entry level positions and retraining incumbent workers.

The Port appreciates the opportunity to provide comments on the 2021-2023 Investment Plan Update for the Clean Transportation Program, and thanks the CEC for continuing to be receptive to our feedback and input. Should you have any questions about these comments or if you would like to strategize on our shared zero-emission efforts further, please do not hesitate to contact Morgan Caswell, Manager of Air Quality Practices, at morgan.caswell@polb.com.

Respectfully,



Matthew Arms
Director of Environmental Planning
Port of Long Beach