

DOCKETED	
Docket Number:	22-EVI-03
Project Title:	National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans
TN #:	243312
Document Title:	Coalition Comments - Investment in Drayage Truck Charging Infrastructure
Description:	Coalition Comments - Investment in Drayage Truck Charging Infrastructure is Paramount to the Success of the Federal NEVI Formula Program - Coalition consists of: Port of Long Beach, The Port of Los Angeles, Harbor Trucking Association, California Trucking Association, Pacific Merchant Shipping Association, Earthjustice, and Los Angeles Cleantech Incubator
Filer:	System
Organization:	Port of Long Beach, The Port of Los Angeles, HTA, Calif. Trucking Assoc., PMSA, Earthjustice and LACI
Submitter Role:	Public Agency
Submission Date:	5/26/2022 3:13:22 PM
Docketed Date:	5/26/2022

*Comment Received From: Morgan Caswell
Submitted On: 5/26/2022
Docket Number: 22-EVI-03*

Investment in Drayage Truck Charging Infrastructure is Paramount to the Success of the Federal NEVI Formula Program

Additional submitted attachment is included below.

Elissa Konove, Undersecretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Steven Keck, Acting Director
California Department of Transportation
1120 N Street
Sacramento, CA 95814
April 22, 2022

Drew Bohan, Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Investment in Drayage Truck Charging Infrastructure is Paramount to the Success of the Federal NEVI Formula Program

Dear Ms. Konove, Mr. Keck, and Mr. Bohan,

The undersigned coalition, representing the nation's largest seaports, the California trucking industry, the major terminal operators responsible for moving goods into, and out of the United States, and nonprofits focused on transportation electrification, equity, and the environment, respectfully requests that the National Electric Vehicle Infrastructure (NEVI) Formula Program, established by the Biden Administration's Bipartisan Infrastructure Law to establish an interconnected network of public charging to facilitate data collection, access, and reliability throughout the United States, shift its focus to deployment of charging infrastructure to support Class 8 drayage trucks, and other heavy-duty vehicles, in the early years of implementation.

A sub-working group of leading agencies in the State of California was organized to provide input on the state implementation of the NEVI Formula Program. At the first sub-working group meeting, it was determined by the program leads, the California State Transportation Agency (CalSTA) and California Department of Transportation (Caltrans), that the focus of the program would be on light-duty vehicle infrastructure in the early years, with potential consideration for medium- and heavy-duty vehicle infrastructure in later years. Although this coalition understands that the goals for zero-emission light-duty vehicle deployment in California are important and aggressive, these goals do not compare to the ambition of the currently proposed California Air

Resources Board (CARB) Advanced Clean Fleets Regulation. If adopted as currently written, this regulation would require all new trucks entering the State's Drayage Truck Registry to be zero-emission starting in January of 2024. However, there are only a handful of planned public chargers to support early battery-electric truck deployments. Thus, investment in heavy-duty, public charging infrastructure today should be a top priority for California.

CalSTA and Caltrans staff's recommendation to focus on light-duty vehicle charging first is based upon the "substantial funding" available or soon-to-be available for heavy-duty public vehicle charging. This coalition disagrees with this rationale, and feels strongly that tallying up dollars available through programs that include heavy-duty public charging as an eligible project type does not respect the nuances of each funding program. Many of the funding programs referenced are expected to be overly subscribed, such as the Port Infrastructure Development Program (PIDP), which includes an incredible swath of eligible project types, and has limitations on eligible applicants. PIDP supports traditional, expensive infrastructure projects, such as rail expansion or the building of bridges, as well as a variety of environmental projects such as clean terminal equipment, harbor craft, and shore power. Furthermore, public charging infrastructure will be largely built out by private companies that are not eligible applicants under programs like PIDP. The NEVI Formula Program is unique in that it allows private entities to apply.

A program founded in equity would look at the impact of vehicle emissions to public health outcomes in the disadvantaged communities they intend to benefit, and would consider the comparative availability of light-duty vs. heavy-duty infrastructure today. Heavy-duty vehicles are a larger contributor to NOx emissions than light-duty vehicles in the State, and particularly, the South Coast Air Basin, which is out of attainment with the federal ozone ambient air quality standards. It is unclear the extent to which public health impacts and current availability of infrastructure for heavy-duty vs. light-duty vehicles were considered in the decision to invest in light-duty vehicle infrastructure only.

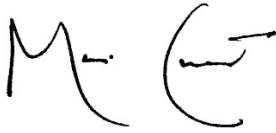
Public charging infrastructure to support zero-emission trucking will look different than what we have seen for light-duty vehicles. The footprint required will need to be much larger than light-duty vehicle infrastructure in order to allow adequate space for trucks carrying a container. Given the heavy use of these trucks, higher-powered chargers for opportunity charging will also be needed long-term to minimize down time. Siting of the infrastructure will also significantly differ given the impacts heavy-duty trucks have on roadways and noise in local communities. Infrastructure installations should not encourage more trucks to frequent shopping centers nor encourage any additional traffic in neighborhoods. Further, the [Port of Long Beach Public Truck Charging and Fueling Study](#) found that the business case for heavy-duty public charging is poor in the near-term for a variety of reasons and that public investment will be critical.

This coalition requests that the NEVI Formula Program sets aside at least 50% of the funding available to California to support infrastructure for Class 8, battery-electric trucks, with an emphasis on drayage trucks serving the nation's busiest seaports throughout all program implementation years. Further, guidelines adopted for light-duty vehicle infrastructure applications should be separate from those developed for heavy-duty vehicle infrastructure applications, as the evaluation criteria should respect the differences between these two vehicle

segments. By supporting drayage trucks in the near-term, CalSTA and Caltrans would ensure the NEVI Formula Program will produce meaningful benefits to disadvantaged communities, and will serve to fill an incredible gap in infrastructure today.

We appreciate your consideration of our recommendations, and look forward to further collaboration on this effort. If you have any questions, please do not hesitate to contact Morgan Caswell, Port of Long Beach Manager of Air Quality Practices, at morgan.caswell@polb.com or (562) 519-2807.

Sincerely,



Mario Cordero
Executive Director
Port of Long Beach



Eugene D. Seroka
Executive Director
Port of Los Angeles



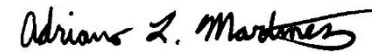
Matt Schrap
Chief Executive Officer
Harbor Trucking Association



Chris Shimoda
Senior Vice President
California Trucking
Association



Thomas Jelenic
Vice President
Pacific Merchant Shipping
Association



Adrian Martinez
Senior Attorney
Earthjustice



Matt Peterson
President & CEO
Los Angeles Cleantech
Incubator

