

DOCKETED

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*Comment Received From: Yasmine Agelidis
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Los Angeles County Electric Truck and Bus Comment Letter

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

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

June 2, 2022

RE: Investment in Heavy-Duty Goods Movement Truck Charging Infrastructure is Paramount to the Success of the Federal NEVI Formula Program

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

The Los Angeles County Electric Truck and Bus Coalition works to advance the adoption of zero-emission trucks, buses, and other vehicles over polluting fossil fuel vehicles, while also ensuring that the communities of color that have long suffered the brunt of environmental racism receive the benefits of clean technology first. Our coalition includes leading non-profit organizations committed to clean energy, organized labor, environmental, and community groups that prioritize zero-emission heavy-duty vehicle strategies that deliver significant and immediate emissions benefits to residents in our region's most polluted and disadvantaged communities, while also equitably expanding California zero-emissions manufacturing and infrastructure industries.¹

We write to respectfully request 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 a portion of its focus to deployment of charging infrastructure to support Class 8 drayage trucks, and other heavy-duty vehicles. 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.

¹ As of early 2020, California supported 275,600 direct electric vehicle industry jobs, including 119,200 in Southern California. In Southern California, jobs in the EV industry pay an average annual wage of \$80,900, well above the average annual wage across all industries of \$60,400. "The Electric Mobility Revolution in Southern California" Los Angeles Economic Development Corporation, March 2020. <https://laedc.org/2020/03/01/laedc-ev-industry-report/>

[The Los Angeles County Electric Truck and Bus Coalition](#) brings together leading voices from clean energy, organized labor, environment, and neighborhood community groups to build a broad movement that supports a 100% electric fleet for Los Angeles County.



Although the focus on light-duty vehicle deployments in California are important, the bulk of our criteria pollutant emissions and equity challenges associated with those emissions continue to be related to heavy-duty vehicles, particularly along the goods movement corridors. Heavy-duty vehicles make up nearly half of the criteria air pollutant emissions in the greater Los Angeles region.² Communities of color and low-income communities are exposed to substantially more trucks than other demographic groups in California, particularly along goods movement trade corridors. Additionally, these communities experience measurable emissions reductions and health outcome improvements with policies and investments that target goods-movement-related emission reductions.³ 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 NEVI dollars in light-duty vehicle infrastructure only.

California is committed to large-scale zero-emission policies, with a priority focus on a drayage truck transition to zero-emissions by 2035, with longer term targets for passenger cars with a zero-emission sales requirement by 2035. If the California Air Resources Board (CARB) Advanced Clean Fleets (ACF) Regulation is 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, as underscored throughout the ACF workshops, there are only a handful of planned public chargers to support early battery-electric truck deployments. 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. Thus, investment in heavy-duty, public charging infrastructure today should be a top priority for California, to support charging around the ports, railyards, and the associated warehouse regions where these drayage vehicles operate

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. Our 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, and cannot support the broad geographic needs of railyard and warehousing locations that are connected to the broader port logistics ecosystem. 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.

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 and railyards throughout all

² California Air Resources Board Mobile Source Strategy and SIP Measures, 2016

³ Meng YY, Su JG, Chen X, Molitor J, Yue D, Jerrett M. 2021. Improvements in Air Quality and Health Outcomes Among California Medicaid Enrollees Due to Goods Movement Actions. Research Report 205. Boston, MA:Health Effects Institute.

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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 about the Los Angeles Electric Truck and Bus Coalition or our comments, please do not hesitate to contact Yasmine Agelidis at yagelidis@earthjustice.org or 213-766-1074.

Sincerely,

Yasmine Agelidis
Associate Attorney
Earthjustice

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