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Comment Received From: Adrian Martinez
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Comments of Earthjustice and LA County Electric Truck and Bus Coalition

Please find the attached comments on the Investment Plan.

Additional submitted attachment is included below.



October 25, 2022

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: 2022-2023 Investment Plan Update for Clean Transportation

Dear Lead Commissioner Monahan and Members of the Energy Commission:

On behalf of Earthjustice and the Los Angeles County Electric Truck and Bus Coalition, I submit comments on the 2022-2023 Investment Plan Update for Clean Transportation. Overall, we are pleased with these historic investments in zero-emission transportation. If wisely spent, these could have major benefits towards our zero-emission future. The following bullets provide some additional suggestions as the Commission moves forward into implementation and finalization of this plan.

- **Continued Focus on Zero-Emissions Transportation is Critical** – We have noticed that several lobbyists for the combustion industry continue to advocate for investments in combustion technologies through these funds. They are wrong, and we encourage the Commission to continue course in a heavy bent towards zero-emission technologies.
- **Truck Charging is Needed ASAP** - Expedited investments in truck charging and associated infrastructure is a “no regrets” investment. These investments will be critical to support forthcoming regulations from the California Air Resources Board, the South Coast Air Quality Management District, and other entities. In addition to investments in fleet charging that is publicly available, we encourage investments in purely publicly available charging for heavy-duty trucks. This is vital given the decision of the Commission and Caltrans not to invest California’s National Electric Vehicle Infrastructure (NEVI) Formula funds into truck charging. Moreover, we encourage the Commission to explore programs to address the years of limited use that may take place at chargers deployed in the near term as the fleet of trucks is small now, but will grow over the next decade. The Commission should also explore investments that can be done very quickly in this category – i.e. truck charging projects that can be delivered in 6-12 months.
- **Prior School Bus Approaches Have Not Addressed Great Needs at Large School Districts** - Electric school bus funding must address the fact that some large school districts like Los Angeles Unified School District (“LAUSD”) are not poised to receive its fair share of funding for electric school buses. We need the Energy Commission to address needs in a different way than is currently done – i.e. on a first come, first serve basis where school districts regardless of size are capped in investments. Clearly, there is a need to go big on electric school buses

at LAUSD as one of the largest school districts in the country, in the most ozone choked area of the country, and transporting amongst the largest population of students in Disadvantaged Communities in the country. We encourage the Commission to figure out how it can help hasten the deployment of hundreds of electric buses and associated infrastructure at entities like LAUSD in the next 2-3 years.

- **Offroad Equipment** - With new funding in the offroad sector, we encourage the Commission to pay special attention to addressing the myriad toxic hotspots that the freight industry has created in California. Coupling investments with agencies like the California Air Resources Board, which is implementing AB 617, could be a good strategy to providing relief to communities that are hard hit by freight pollution.
- **Port Funds** – We encourage the Commission to engage community stakeholders in ensuring funds to clean up Port equipment is used wisely. Port authorities have become experts at green public relations – even as they continue to fall behind in advancing zero-emissions in many parts of port operations. We need the Commission to work with community advocates to push port authorities to advance clean up in harder sectors like shipping, commercial harborcraft, and locomotives. It is important that the Commission not solely rely on community outreach from port authorities in developing programs to use port related funds.
- **Electric Refuse Trucks** - We encourage programs to electrify refuse trucks through this investment plan. The Commission should develop a companion program to the California Air Resources Board’s effort to increase the number of zero-emission refuse trucks in California.¹ Investments in refuse trucks will allow the Commission to bring electric vehicles to virtually every neighborhood in California, which could also advance equity in investments. Finally, these are good investments as they can be targeted towards public agencies like sanitation departments, which is a direct investment in California government.

We appreciate your consideration of these comments, and we look forward to working with the Commission on program implementation.

Sincerely,

Adrian Martinez

¹ CARB, Proposed 2022-2023 Transportation Investment Plan, at p. 23, *available at* https://ww2.arb.ca.gov/sites/default/files/2022-10/proposed_fy2022_23_funding_plan_final.pdf.