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WattEV Tri-State RFI Response

Additional submitted attachment is included below.

WattEV

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California Energy Commission

Project Proposal Ideas and Considerations for California, Oregon, and Washington's Medium- and Heavy-Duty Joint Application for the U.S. Department of Transportation's Charging and Fueling Infrastructure Discretionary Grant Program RFI

Docket #24-EVI-01

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Driving a More Sustainable Future

Table of Contents

Introduction

WattEV is delighted to submit our response to the Project Proposal Ideas and Considerations for California, Oregon, and Washington's Medium- and Heavy-Duty Joint Application for the U.S. Department of Transportation's Charging and Fueling Infrastructure Discretionary Grant Program RFI (Docket #24-EVI-01)

WattEV is a California-headquartered company that is revolutionizing the transportation sector through its innovative truck as a service (TaaS) program and network of fast-charging stations for medium- and heavy-duty electric vehicles (MHDEVs). With California at its core, WattEV is strategically locating refueling stations across the country, which also includes projects in Oregon and Washington.

In this document, you will find our detailed answers to all the questions related to the RFI, along with comprehensive information on our relevant projects. The substance of our submission is focused on WattEV's future vision for EV infrastructure deployments along the tri-state corridors.

We are happy to answer any additional questions you and the team may have as you evaluate this RFI response, and we look forward to working with tri-state partnership team in deploying projects on the West Coast.

Question 1: Business Type

Please disclose your business type and vehicle class, if applicable. Are you a driver, fleet operator, truck stop operator, installer, manufacturer, utility, public agency, or other? Are you part of a small, veteran-owned, woman-owned, or minority-owned business?

WattEV is a private company that is both a charging infrastructure and a Trucking-as-a-Service (TaaS) provider. WattEV's innovative TaaS business model provides equitable access to battery-electric **heavy-duty** trucks—including charging, maintenance, and insurance—that helps small and mid-sized fleets transition to ZE technology in a way that is both convenient and cost-effective. Using the TaaS platform as the foundation for recurring revenue, WattEV brings an innovative approach to combine private capital and public funding to build needed charging infrastructure. The charging depots—all designed to accommodate megawatt charging based on the Megawatt Charging System (MCS)—are a unique approach to charging medium- and heavy-duty electric vehicles (MHDEVs) that mimics the conventional truck stop experience with amenities, queuing, and rest areas. WattEV leases out battery-electric trucks to fleets for the same cost as a diesel truck, allowing for smaller fleets that typically would've been left out of the market due to the high-cost burden to access clean technology. WattEV's TaaS fleet mainly consists of **Class 8** electric trucks.

WattEV's mission is to accelerate the transition to zero-emission transportation (ZET) within the heavy-duty trucking market, which is accomplished through a combination of business and technology innovation to create infrastructure and data-driven workflow that provides truckers and fleet operators with the lowest total cost of ownership (TCO). To address challenges of commercial MHDEV deployment by the lack of refueling infrastructure, WattEV is building a critical network of publicly accessible MHDEV refueling stations that are built to be affordable, resilient, and adaptable. The refueling stations will achieve important decarbonization and ZE goals within the transportation industry, which are crucial to environmental, economic, and community health, especially in disadvantaged communities (DACs) and low-income communities (LICs). WattEV has selected its depots in local DACs, which provides sustained employment opportunities, workforce training, economic and health impacts. As WattEV's network of sites expands, WattEV continues to collaborate with local government, state agencies, non-profit organizations, and the overall industry to bring emissions reduction to the forefront of transportation today.

Question 2: CFI Grant Funding Consideration

Would you consider applying for CFI grant funding for site development if the tri-state agencies are awarded funding?

Yes, WattEV intends to apply for CFI grant funding upon the tri-state agencies being awarded funding. CFI grant funding would allow for the expansion of WattEV's sites situated along the 1-5 corridor, a key freight route throughout California and the West Coast. Without immediate funding support, the critical infrastructure development along vital corridors will be significantly delayed, hindering the transition to clean transportation, and impacting air quality improvement goals. WattEV's proven technologies and innovative offerings at many of its sites are ready for deployment, but funding constraints currently postpone their implementation. By providing funding, public agencies can help bridge the gap and accelerate the deployment of critical refueling infrastructure, enabling WattEV to deliver its

groundbreaking solutions and contribute to a cleaner, more sustainable future. Reduction in the charger count for combined charging system (CCS), deployed at most of WattEV's sites, will lead to a drop in the utility of the site and overall traffic expected for servicing vehicles.

Question 3: Zero-Emission Battery Electric MDHD Deployments

Do you already operate or are you planning to use zero-emission battery electric MDHD vehicles in the next five years? Please use a 1-5 rating scale where 1= least likely and 5= most likely. Please add additional information regarding your (planned) use of zero-emission battery electric MDHD vehicles as desired.

WattEV will certainly (Rating = 5) be using zero-emission battery-powered MHDEVs in the next five (5) years. WattEV is not only a charging infrastructure provider, but also a TaaS provider. WattEV views the domiciling of MHDEVs at its charging sites for it TaaS fleet as a crucial part of its business model and a necessary service for promoting the adoption of MHDEVs, especially for small and mid-sized fleets. WattEV currently has a TaaS fleet of 36 total vehicles consisting of Volvo VNRe, Nikola TRE, BYD 8TT, and Daimler eCascadia Class 8 BEVs. **In fact, WattEV has recently announced at the 2024 Advanced Clean Transportation (ACT) Expo that it will; expand its TaaS fleet to over 189 class 8 battery-electric trucks by the end of 2024 and a goal of 12,000 battery-electric trucks by 2030. This would make it the largest deployment among current electric commercial fleet operators.**

As an industry leader and a "first-to-market" ZE infrastructure provider for public access, WattEV has spent the past three (3) years launching the first corridor for MHDEV refueling across the nation. This refueling station network— combined with WattEV's unique TaaS platform— offers a scalable and efficient solution to accelerate the adoption of ZE trucks for a variety of uses, **including drayage and long-haul freight**.

Below is a list of WattEV's public charging depots currently under construction or open to the public:

- **Sacramento, CA**; located on I-5 and opening in 2025.
- **Port of Oakland**, **CA**; located on I-880, I-80, and I-580 and opening in 2026.
- **Stockton, CA**; located on SR 99 and opening in 2026.
- **Gustine, CA**; located on I-5 in Merced County and opening in 2025.
- **Fresno, CA**; located on SR 99 and opening in 2026.
- **Taft, CA**; located on I-5 in Kern County and opening in 2025.
- **Bakersfield, CA**; Located on SR -99 and **opened in May, 2024.**
- **Vernon, CA**; located along I-710 in Los Angeles County, opening by Q4 2024
- **Gardena, CA**; located on I-110 and **opened in April, 2024.**
- **Port of Long Beach; CA**; located on I-710 – **opened in May, 2023.**
- **San Bernardino, CA**; located on I-215/I-10 and **opened in April, 2024.**
- **Perris, CA**; located along I-215 opening by Q1 2026.
- **Salem, OR;** located on I-5 and opening in 2026.

At many of WattEV's sites, vehicles will support large potential clients. WattEV hopes to match the availability of trucks with the accessibility of publicly available charging infrastructure to bridge the gap towards a more mature, lower-risk ZE transportation environment. WattEV fleet partners understand that their transportation needs will change in coming years and believe WattEV provides a vital piece of a solution to their ZE conversion plans. Any interested fleet manager or driver could lease a Volvo, BYD or

Nikola truck from WattEV and immediately start driving. Customers would be able to take advantage of the WattEV network of charging infrastructure, which provides stability for route planning while they test out vehicle types before making a larger investment.

Question 4: Types of Public Charging

What type of MDHD ZEV public charging do you anticipate being most important in the next three years (2024-2027) – en route or overnight charging? For what purposes do you anticipate needing public charging infrastructure – drayage, last-mile, delivery, long-haul freight, other?

MHDEVs Charging

Both en route and overnight charging will continue to grow in importance over the next three (3) years as the country continues to build out MHDEV charging infrastructure. However, *charging time* is a key limiting factor that **places a greater importance on building out en route** charging for these vehicles. For the early stages of MHDEV refueling, charging times will be longer than traditional internal combustion engine (ICE) diesel truck timelines. These longer timelines are not necessarily a hurdle for overnight charging. However, longer en route charging times will complicate route planning and overall logistics strategies. Drivers may need to follow strict schedules to reach their destinations within a certain time frame. These drivers would *first*; need a sufficient number of charging stations and dispensers available to allow for en route charging and *second*; require shorter charging times to stay within their schedule. **WattEV views MCS charging as the most important and relevant form of charging infrastructure for MHDEVs because it reduces charging time to around 30 minutes**. MCS charging puts charging time at about the same scale as fossil fuel refueling, making the transition to ZEVs feasible for fleets because of the reduction in charging time. WattEV aims to revolutionize the industry by deploying MCS chargers across our entire site portfolio which significantly reduces charge time.

Public Charging Infrastructure Needs

WattEV mostly intends to use public charging infrastructure for **long-haul freight and drayage**. WattEV's TaaS service focuses exclusively on providing heavy-duty EVs to fleet operators, particularly Class 8 electric vehicles. These vehicles are most commonly used for long-haul freight and drayage.

Reliable and fast public charging is critical to supporting the transition to heavy-duty EVs. In California, approximately a combined 5.8 million truck miles are traveled on I-5 and SR-99 each day; however, a key barrier to shifting these miles traveled to "EV truck" miles traveled is the availability of charging between key distribution points, such as those along I-5. The shorter distances of charging stations between key distribution points allow different routes to be supported while new vehicles and charging technology are introduced. Additionally, it provides an option for opportunity "refueling" for small, medium, and large-scale drayage. With this in mind, WattEV is committed to establishing charging stations at sites along key corridors and is currently developing a series of sites in California that are near or connect to I-5 or SR-99. The distances between these sites does not exceed 170 miles.

Question 5: Charger Power Level Priority and Configuration Preference

From 2024-2027, what is your first priority for power level and number of charging ports for public en route charging at a station? For public overnight charging? Do you have a second or third configuration preference?

WattEV views MCS charging as the most important and relevant form of charging infrastructure and is striving towards building out the MCS network. Thus, **WattEV's first priority for power level is MCS charging**. However, MCS truck OEMs do not yet exist, therefore WattEV is focusing on deploying a combination of both MCS and CCS chargers. **WattEV is aiming to install both MCS and CCS chargers at all of our sites, aiming for at least 20% of all chargers to be 1MW+ MCS.** WattEV's deployment of Charge America's MCS 1x5 system allows for both MCS and CCS charging which helps to bridge the gap between CCS and MCS-charging capable trucks. The MCS 1x5 system is a combination of five (5) 240kW CCS chargers and one (1) 1,200kW MCS charger capable of charging a Class-8 truck in 30 minutes. Additionally, the Gen-II MCS 1x5 system has a compact, modular design that can be prefabricated and deployed in a configuration similar to conventional diesel fuel pumps – increasing accessibility, convenience, and familiarity for users while reducing installation and construction costs, and utility interconnection expenses.

With limited access to MCS charging technology, CCS 240kW and 1.2MW MCS will accommodate demand for fleets of various routes and sizes. MCS charging at these stations will allow for higher charging and more dynamic refueling scenarios (**such as en route charging)** on par with current ICE engine efficiency. For example, larger battery pack trucks, such as the Volvo VNR Electric model, would be able to park at a MCS dispenser at 10% battery level and exit 30 minutes later with 90%. The 240kW CCS chargers will require around two (2) hours to charge depending on battery size and state of charge, **well suited for some overnight applications**.

Question 6: Preferred Parking Type for Charging

Please identify the percentage of pull-in or pull through parking preferred and other desired station configurations at a given site. Describe the vehicle class and vocation considered when making this recommendation if it differs from the information provided in question 1.

At many of WattEV's sites, pull-through charging stalls will be equipped with "fast-charging" MCS dispensers to allow for both easier access and faster charging rates for Class 8 Vehicles. **For sites mostly servicing Class 8 on-road vehicles, WattEV views 20% pull-through (80% pull-in) stalls as the preferred percentage,** which is based on both site size limitations and MCS charger configurations (Charge America's 1x5 MCS charger model).

At WattEV's site at the intersection of Taft HWY and I-5, the fast-charging MCS chargers will be centrally located for pull-through access. The orientation of easy to access MCS charging at these stations will allow for higher charging (approximately 30 minutes to refuel) and more dynamic refueling scenarios on par with current ICE engine efficiency. The site is designed to not only accommodate the size and operability demands of large commercial vehicles, but the various charging rates required for complex logistics

networks. The pull-through 1.2MW MCS "fast charging" stalls will enable route planners and operators to toggle charging speeds.

Question 7: Distance between Charging Stations

What distance should separate charging stations to support zero-emission trucks along the I-5 corridor? Provide description of typical route or use-case considered when making this recommendation. Describe the vehicle class and vocation if it differs from the information provided in question 1.

A barrier to EV adoption within the medium-and heavy-duty vehicle classes is charging availability between key distribution points. Many of WattEV's projects directly provide a solution to these challenges, including connecting local and national alternative fuel corridors, providing more optionality for route planners and fleets, and expanding existing infrastructure.

WattEV has polled fleets, drivers, and route planners across California to understand their concerns and believes that it makes most sense to **keep charging sites for MHDEV trucks at intervals of no more than 200 miles**. This distance allows different routes and truck classes to be supported while new vehicles and charging technology are introduced over the coming decade. Popular OEM models like the Volvo VNRe and Nikola TRE are already capable of 300-mile ranges. As with all refueling network designs, special attention must also be given to topography, historic congestion on peak hours, and even utility presence and capabilities in rural areas.

For a series of sites that WattEV is developing in the California Central Valley near I-5 and SR-99, the average distance to the nearest WattEV site is 103 miles, with none of the distances exceeding 140 miles (see Table 1 below). These ranges are well within many Class 6-8 long haul heavy-duty commercial vehicles and most Class 2-6 medium-duty vehicles and offers an option for opportunity "refueling" for small, medium, and large-scale drayage.

Table 1: Project Site Distance Summary

Site City	Site Interstate	Distance to Nearest WattEV Site
Stockton, CA	I-5/I-580/I-880	69.4 miles to Port of Oakland
Fresno, CA	SR-99	97.9 miles to Bakersfield
Gustine, CA	I-5/ I-580 / I-880	88 miles to the Port of Oakland
Taft, CA	I-5 / I-710	133 miles to the Port of Long Beach

The economic impact of this short distance MHDEV refueling is profound. Developing the sites shown in the table above will enable immediate parity with diesel fueling operations, allowing fleets to electrify in greater numbers more quickly, and support more complex logistics routing than operators would otherwise be capable of today. This is necessary for North-to-South California mixed goods delivery, including port drayage and last-mile logistics and can apply to longer distances into Oregon and Washington. The short distances between refueling points enable Independent Owner Operators (IOOs), and small-, medium-, and large-sized fleets to avoid the cost of purchasing, installing, and operating private refueling infrastructure.

Question 8: Site Amenities

What amenities are you seeking at a charging facility? Is there a desire for additional parking at a facility beyond charging stalls? Is there a desire for reservation options?

To promote the adoption of MHDEVs, charging station developers should not only strive towards reaching the diesel refueling parity of conventional truck stops, but should also strive towards matching the overall convenience that conventional truck stops provide to truck drivers. For this early period of MHDEV refueling, charging times are going to be longer than traditional ICE diesel truck timelines. This means that while charging infrastructure and reduction of emissions are integral, each site must also be highly available, accessible, and safe. Truck drivers may spend long periods of time on the road. MHDEV refueling stations should consider providing resting areas that promote the overall wellbeing of the workforce in addition to much needed refueling.

*Figure 1: WattEV Gustine site in Merced County, CA. Note the separated passenger vehicle charging section, near the WattEV operated amenities station. *All renderings are conceptual.*

While not all of WattEV's sites will provide such a large array of amenities, WattEV is developing two (2) large charging depots in the California Central Valley (i.e., Gustine and Taft) that are designed to accommodate megawatt charging based on the MCS while mimicking the conventional truck stop experience with amenities, queuing, and rest areas. WattEV's Gustine site (see Figure 1) will be designed with rest areas and open spaces for drivers to enjoy while their vehicles charge. Unlike traditional refueling locations, this kind of ZEV charging enables a new kind of charging experience–one that removes the health impacts from standing near the truck while out of commission. Instead, the station serves as a point of leisure for the truck driver, which makes sitting pavilions and supported food vendors key for driver satisfaction and site usage. Both the Gustine and Taft sites will be uniquely green with planted native vegetation, and noticeably quiet due to totally battery-electric operations. Parking will also be provided for TaaS drivers on shifts with leased vehicles or for drivers resting in between shifts. In summary, these two sites will provide fleets with:

- On-site personnel to support critical needs from drivers, fleet managers, or passenger vehicle customers.
- An array of amenities
    - Restrooms
    - Food
    - Rest area
    - Free parking
    - Reserved area at Gustine site for third-party restaurants to collocate.

WattEV also incorporates the following key practices outlined in Table 2 below at all of our sites:

Table 2: Key safety and security measures WattEV applies to all project sites.

Key Practice	Description
Futureproofing	WattEV considers expansion potential when choosing sites, including the feasibility of future on-site solar generation or battery energy storage systems (BESS) to address specific charging needs. WattEV's flagship Bakersfield site features solar and BESS, showcasing our strategic approach to assure project completion and long-term success.
Station Compliance and Safety	By incorporating comfortable turning radiuses, clear refueling markings, and extended sightlines, WattEV anticipates a significant reduction in inter-station commercial vehicle accidents. Prominent signage will also highlight safety features, amenities, traffic flow, and segregated charging areas, adhering to all safety protocols.
Accessibility Considerations	WattEV is committed to building inclusive EV charging stations that exceed Americans with Disabilities Act (ADA) compliance standards, ensuring equitable access for all drivers.
Public Access Compliance	The buildout of publicly available charging infrastructure compliant with (23 U.S.C. § 151 (f)(4)(A)(i)) is key to the rollout of electric trucks. The proposed project makes public accessibility to trucks via both CCS-1 connectors as the current standard and via MCS connector as the future standard.
Public Information and Payment Options	Public information is made available via application programming interface (API) and WattEV's company application system which informs drivers interested in charging about availability and price in real time.
	Payment: Users can post pay for their charging by registering to white label their vehicle ID on WattEV's database, in which case the vehicle is recognized and charged by simply connecting and communicating with the charger, or by use of online payment triggered with scan of the QR code on each charger.
	Access Security & Privacy: Access security is insured by incorporating the latest cyber security methods to make sure that unauthorized EVs cannot tap into the white labeled accounts of other users by mimicking their MAC address.
	Access Convenience: Authorized and registered public users can charge as conveniently as connecting the charge dispenser to the vehicle and letting the electronic communication occur under the ISO standard. WattEV is a strong advocate for industry-wide interoperability and hosted the latest and largest interoperability test at its POLB depot in May 2023.
	Access Fairness: There is no discrimination applied in achieving fair and equal access. WattEV payment methods are accessible to persons with disabilities, do not require a membership, do not affect the power flow to vehicles, and provide access for those that have limited English proficiency.

Question 9: Charging Stations Cost Estimates

If possible, provide any general cost estimates for MDHD charging stations you have designed, built, or have experience with, including charger power levels and number of chargers installed. Please provide a range of public cost share as a percentage of total project cost that would be necessary to support more public charging stations to serve zero-emission trucks along freight corridors.

WattEV has designed and built a range of charging stations varying in size, in terms of both charger count and area. These sites will be equipped with Charge America chargers with a power rating of 240kW for CCS dispensers and 1200kW for MCS dispensers. In an effort to rapidly build out the EV charging network along the West Coast, WattEV has pursued and secured funding from local, state and federal agencies and

entities, receiving public funding shares mostly ranging from 50% to 80% of total eligible project costs. Due to cutting-edge aspect and power rating of MCS dispensers, higher shares of public funding will be required to equip sites with these dispensers. For sites with a minimum of 15 240kW CCS chargers and three (3) 1200kW MCS chargers, it would be reasonable to assume that a 65% public cost share would be required. For larger sites with at least 45 240kW CCS chargers and nine (9) MCS chargers, ideal public cost share should be around 80%. The subsequent paragraphs provide more detailed information on WattEV's site development experience, power levels of chargers deployed and project cost and public cost share estimates from sites currently under development.

Question 10: Suggested CFI Locations

Use the maps under the "Corridor Segments" section below to identify locations within the National Zero-Emission Freight Corridor Strategy hubs along I-5 (identified in the map segments below) you anticipate needing EV charging in the next three years (2024-2027). You may identify sites where you plan to or would be interested in building charging stations or where you would like to see charging as a consumer. Please detail preferred locations across California, Oregon, and Washington. For each location, please provide desired site characteristics, including number of chargers, power levels, type of charging desired (overnight or en route), and vehicle class and vocation if the information differs across locations or differs from the information provided in the questions above.

WattEV is making substantial investments in the I-5 corridor from California to Oregon, with eight (8) sites undergoing engineering design from San Diego to Salem along this crucial Priority Clean Freight Corridor (PCFC) on the West Coast. The following information describes site locations that WattEV plans to complete or is interested in for building charging stations.

Enhancing Port Goods Movement in Washington North Whatcom County, Washington)

- Number of Chargers: 20 CCS, 4 MCS dispensers
- Vehicle Type: Class 8 BEVs
- Type of Charging: 24/7 accessible en route charging
- Corridor Segment: Washington Corridor Segment #1 – Blaine to Southcenter
- Description: North of the I-5 close to the Canadian border. This site will support freight traffic travelling between the borders from Washington to Canada or vice versa and will ultimately be part of WattEV's charger network that connects CA, OR and WA.

Serving Freight Corridors Along I-5 in Multnomah County (Portland, Oregon)

- Number of Chargers: 15 CCS, 3 MCS dispensers
- Vehicle Type: Class 8 BEVs
- Type of Charging: 24/7 accessible en route charging
- Corridor Segment: Oregon Corridor Segment #1 – Haden Island to Woodburn
- Description: I-5, near intersection between I-5 and I-405 or I-5 and I-84

Building Northern California Charging Stations Accessibility (Redding, CA)

- Number of Chargers: TBD CCS, TBD MCS dispensers
- Vehicle Type: Class 8 BEVs
- Type of Charging: 24/7 accessible en route charging
- Corridor Segment: Segment #1 – Red Bluff to Zamora
- Description: This site would support WattEV's buildout of stations throughout the West Coast, linking the sites in Northern California (Sacramento, Fresno, Stockton, Port of Oakland) to the sites in both Oregon (Salem, Portland) and Southern California (Port of Long Beach, Perris, Vernon, Gardena, San Bernardino, Oxnard, Otay Mesa).

Expanding Southern California Truck Routes (Castaic, California)

- Number of Chargers: 20 CCS, 4 MCS dispensers
- Vehicle Type: Class 8 BEVs
- Type of Charging: 24/7 accessible en route charging
- Corridor Segment: California Corridor Segment #3 – Castaic to I-5 & Hwy 210
- Description: WattEV is planning on developing a MHDEV station within a strategic segment of I-5, **located just south of the "Grapevine," a 40-mile crucial pass for trucks hauling cargo to and from ports in Oakland, Los Angeles, and Long Beach, three of the busiest ports in the world**. This route also helps to connect major Ports in Southern California to Oregon and Washington. An average of 85,000 motor vehicles pass through this region everyday with 30% of these vehicles being commercial vehicles. Additionally, this site would support WattEV's buildout of stations throughout the state, linking the sites in Southern California (Port of Long Beach, Perris, Vernon, Gardena, San Bernardino, Oxnard, Otay Mesa) to sites across the Valley and in Northern California (Sacramento, Fresno, Stockton, Taft, Gustine, Port of Oakland).

Constructing International Border MHDEV Charging Stations Near I-5 (Otay Mesa, California)

- Number of Chargers: 45 CCS, 9 MCS dispensers
- Vehicle Type: Class 8 BEVs
- Type of Charging: 24/7 accessible en route charging
- Description: WattEV is developing a MHDEV station in the Otay Mesa neighborhood of San Diego County, which is located within a ZE freight hub designated by the National Zero-Emission Freight Corridor Strategy. Otay Mesa is a strategic location that lies along the international border with Mexico and is **home to California's largest commercial land port of entry with more than $68 billion in trade on an annual basis, processing nearly one million commercial trucks per year**.
- Freight Corridors: The area of interest is located just east of **State Route (SR-905), a crucial highway that connects to major interstates such as I-5 and I-805 and extends to the border with Mexico**. **It is located about 9 miles from I-5 and 8 miles from I-805.** The site is also located near the intersection of SR-905 with SR-125, another key highway that connects Mexico to more inland regions of San Diego County.