

DOCKETED

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POLB Comments - CEC RFI - CA Ports USDOT CFI

Additional submitted attachment is included below.

June 27, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Request for Information - Considerations for the California Energy Commission Zero-Emission Medium- and Heavy-Duty Drayage Infrastructure Application for the U.S Department of Transportation's Charging and Fueling Infrastructure Discretionary Grant Program

Submitted Electronically: [Docket #24-EVI-01](#)

Dear California Energy Commission Staff,

The Port of Long Beach (Port) is pleased to submit this comment letter to the California Energy Commission Request for Information – Considerations for the California Energy Commission (CEC) Zero-Emission Medium- and Heavy-Duty Drayage Infrastructure Application for the U.S Department of Transportation's (US DOT) Charging and Fueling Infrastructure (CFI) Discretionary Grant Program. The Port is supportive of the CEC's plan to submit an application to the US DOT CFI program for public charging and fueling projects that support adoption of zero-emission drayage trucks.

The Port of Long Beach, jointly with the Port of Los Angeles, adopted ambitious zero-emission goals in the 2017 update to the [San Pedro Bay Ports Clean Air Action Plan \(CAAP\)](#)¹, including a goal for 100% zero-emission drayage trucks by 2035. Since adoption of the CAAP update, the Port has evaluated public charging and fueling opportunities for trucks on Port property through a first of its kind [study](#)². Additionally, the two Ports adopted a Clean Truck Fund Rate, which charges \$10 per twenty-foot equivalent unit (TEU) to beneficial cargo owners or their agencies for movement of loaded containers into and out of terminals, made by trucks that are not zero-emissions, or in limited cases, low-NOx. Funds collected through the rate are then invested in projects or programs capable of spurring further adoption of zero emission trucks, such as charging and fueling projects or voucher programs for purchase of zero emission trucks.

Given the significant contribution from heavy-duty trucks to poor air quality in communities adjacent to the Port, we are strongly recommending that the CEC prioritize seaports and alternative fuel corridors serving seaports in their application to the US DOT CFI Program. According to the 2022 Emissions Inventory, drayage trucks are the second largest contributor to NOx emissions and the top contributor to greenhouse gas emissions at the Port of Long Beach. Further, there are over 40 federally designated disadvantaged communities within a 6-mile radius

¹ <https://cleanairactionplan.org/2017-clean-air-action-plan-update/>

² <https://polb.com/environment/our-zero-emissions-future/#program-details>

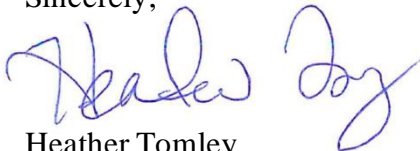
of the Port that are impacted by the drayage trucks traversing roadways. This is uplifted by the National Zero-Emission Freight Corridor Strategy, which prioritizes infrastructure at or near the San Pedro Bay Ports in all four phases of strategy implementation.

Building the requisite network of public charging and fueling to support the transition to zero emissions for the 23,000+ drayage trucks in the San Pedro Bay Ports Drayage Truck Registry (PDTR) is a daunting task. According to the statistics available for June 2024, there are currently 312 battery-electric trucks and 33 hydrogen fuel cell trucks in the PDTR – representing roughly 1.5% of the total fleet. The available infrastructure to serve the tens of thousands of trucks that must transition is limited. If the drayage community is to meet the California Air Resources Board Advanced Clean Fleet Regulation deadline of 2035 for full zero-emission drayage truck adoption, infrastructure near the Ports and throughout the South Coast Air Basin must scale significantly and rapidly.

For these reasons, in addition to our valued partnership we have built with CEC staff, the Port of Long Beach team commits to support the CEC in their application development and we are open to discussions regarding the provision of Clean Truck Fund Rate dollars to support public charging or fueling for drayage trucks within the CEC application.

We look forward to hearing from CEC staff. Thank you for this opportunity to provide feedback on the CEC application to the CFI Program. If you have any questions, please contact Morgan Caswell, Manager of Air Quality Practices, at Morgan.Caswell@polb.com.

Sincerely,



Heather Tomley
Managing Director of Planning and Environmental Affairs