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Comment Received From: William Barrett, American Lung Association

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American Lung Association comments on Revised 2019-2020 CTP plan

Additional submitted attachment is included below.



August 9, 2019

Commissioner Patricia Monahan California Energy Commission 1516 9th Street Sacramento, CA 95815

Subject: Support for Revised Clean Transportation Program 2019-2020 Investment Plan Update

Dear Commissioner Monahan:

On behalf of the American Lung Association in California, I am writing to express our support for the revised 2019-2020 Investment Plan Update for the Clean Transportation Program as discussed at the August 5th meeting of the Advisory Committee. As a member of the Committee, I wish to thank the staff and Commission leadership for the open, thoughtful process followed to develop the proposed plan.

The American Lung Association's 2019 State of the Air report highlighted the ongoing challenges facing Californians due to unhealthy levels of ozone and particle pollution. California is home to seven of the ten most ozone-polluted cities, and six of the ten US cities most impacted by annual particle pollution levels. The impacts of unhealthy air are not shared equally, with lower income communities often bearing the greatest burdens due to major local sources of pollution. The 2019 State of the Air report also notes that climate change impacts are making the job of cleaning our air much more difficult.

As noted in our letter and comments on prior drafts of the Investment Plan, we support the ongoing focus and direction for investment in zero emission technologies as an important element of the state's overall drive to achieving a healthy, sustainable transportation system. Specifically, we view the following as strengths of the plan:

Addressing Gaps in Zero Emission Vehicle Infrastructure – the Clean Transportation Program provides important funding increases in the passenger vehicle ZEV infrastructure as California pursues its goals of 1.5 million ZEVs by 2025 and 5 million by 2030 in order to reduce harmful transportation pollution. The Lung Association's 2016 report on ZEVs estimated \$15 billion in annual health and climate impacts to California as the result of passenger vehicle missions. The increased emphasis for this category should be targeted to identify and fill gaps in the passenger vehicle infrastructure network to serve all communities, and to support the goal of 250,000 charging connectors by 2025. We appreciate the ongoing attention to hydrogen infrastructure and the emphasis on renewable hydrogen production within the remaining alternative fuel category.

Supporting Heavy Duty Electrification – importantly, the Investment Plan proposal to invest \$30 million into medium- and heavy-duty vehicles and infrastructure will advance the critical transition to zero emission deployment across the broader heavy vehicle category. In parallel to innovative regulations recently adopted and currently in development by the California Air Resources Board, this program category advances critical zero emission technologies to reduce health and climate

impacts from the heavy duty sector. We encourage the Commission to pursue projects serving major sources of harmful local pollutants, including communities heavily impacted by freight distribution warehouses and port operations.

Building Stronger Community Input and Engagement – the proposed Investment Plan has improved over the course of the public process, notably with the input of the Disadvantaged Community Advisory Group. The thoughtful work of the group and the presentation to the Advisory Committee were valuable additions to this process that we would like to see continue. We appreciate that the Investment Plan has added more emphasis on workforce training in disadvantaged communities and illustrates the commitment to evaluation community benefits associated with Clean Transportation Program investments. We encourage the Commission to consider adding environmental justice voices to the Clean Transportation Program Advisory Committee and to ensure equity remains at the forefront of the dialogue.

Thank you for your work to develop a strong plan targeted to emission reductions and the transition to zero emissions for the transportation sector. We look forward to continuing to work with the Commission and stakeholders to support strong grant programs that improve public health.

Sincerely,

Will Barrett

Clean Air Advocacy Director