

DOCKETED

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Project Title:	2020-2021 Investment Plan Update for the Clean Transportation Program
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*Comment Received From: South Coast Air Quality Management District
Submitted On: 4/2/2020
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**South Coast Air Quality Management District staff comments
regarding 19-ALT-01**

Document attached

Additional submitted attachment is included below.



South Coast Air Quality Management District

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April 2, 2020

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 19-ALT-01, 2020-2023 Clean Transportation Program Investment Plan

Dear Mr. Brecht,

South Coast Air Quality Management District (South Coast AQMD) staff respectfully submit these comments in response to 19-ALT-01, the Clean Transportation Program's 2020-2023 Investment Plan. We are committed to commercializing zero and near-zero emission vehicles with renewable fuel production and dispensing in the South Coast AQMD region.

South Coast AQMD staff recognize that large scale implementation of ZEVs, both fuel cell and battery electric vehicles, are critical to the state achieving its overall environmental goals. In addition to the state objective of deploying five million ZEVs, Executive Order B-48-18 maintains the hydrogen infrastructure target of 200 hydrogen retail stations (HRS) by 2025. Additionally, South Coast AQMD staff believe that recent revisions to CARB's Low Carbon Fuel Standard (LCFS) program should stimulate increased private investment for hydrogen stations, but these revisions alone are unlikely to be sufficient to implement 200 light-duty hydrogen stations by 2025. That is why your continued support for hydrogen stations is so vital.

The South Coast Air Basin is classified as an "extreme" nonattainment area for ozone under the federal Clean Air Act. Funding to scale up hydrogen infrastructure, coordinated with greater deployment of zero emission vehicles, will provide a critical step toward achieving the air quality standards with considerable public health benefits for our region. Furthermore, this funding can contribute toward the near- and long-term greenhouse gas emissions and petroleum usage reduction goals.

South Coast AQMD staff fully support investments in charging and near-zero fueling infrastructure, and requests on-going and long-term prioritization for HRS funding. We look forward to upcoming solicitations to implement the Clean Transportation Program and will continue to work with CEC to identify the best role for SCAQMD to play to support this program within our jurisdiction. If you have any questions about our comments, please do not hesitate to contact me.

Sincerely,

Matt Miyasato, Ph.D.
Deputy Executive Officer