



October 24th, 2023

Honorable Lee Ann Eager
Chair, California Transportation Commission
1120 N Street, MS 52
Sacramento, CA 95814

Re: Comments on the Draft SB 671 Clean Freight Corridor Efficiency Assessment

Dear Chair Eager,

Thank you for this opportunity to provide feedback on the Draft SB 671 Clean Freight Corridor Efficiency Assessment. The Coalition for Clean Air is grateful to have been given the opportunity to participate in the SB 671 Workgroup Meetings and provide early feedback on the contents of this report. The robust public engagement process organized by the California Transportation Commission helped to ensure that all voices were heard and incorporated into the Draft Assessment. The detailed work that your staff has done to put this together is very important to the future of our state as the report itself details the benefits the implementation of this report will have on public health and climate.

We appreciate the draft assessment's strong focus on ensuring that progress in building zero-emission infrastructure doesn't come at the cost of harming California's communities. In particular, we are strongly supportive of the language to encourage the re-routing of trucks away from near-freight communities and involve environmental and air quality stakeholders in the planning and development process as much as possible. With 72 million people in the U.S. currently living near truck freight routes, it is important that their voices are represented in important decisions that impact their cardiovascular health¹. We also appreciate the concern about making sure that implementation does not contribute to resident and business displacement.

We support the recommendations in the report to streamline the zero-emission infrastructure permitting process. As the report highlights, implementing this assessment will reduce air pollution by 53 percent by 2040 and potentially avoid 1,720 premature deaths. These strong public health benefits combined with the Governor's order to reach 100 percent zero-emission medium- and heavy-duty vehicles by 2045 show that we cannot afford to wait on

¹ *United States Environmental Protection Agency* (2023) Environmental Justice and Transportation.
<https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

implementation. For these reasons, we support the recommendation to expedite the charging station permitting process under CEQA and NEPA, though we ask that precautions be taken to ensure that no significant environmental harm is caused by the construction of the charging stations.

We also urge the assessment to ensure there are as few biases as possible in the creation of the initial viable network. The assessment currently estimates that about 800-850 hydrogen fuel cell stations and 475-525 battery electric stations will be needed to ensure that there are enough chargers available to EV owners by 2035. However, according to the California Energy Commission, there are currently over 90,000 electric charging stations and only 115 hydrogen charging stations, with only 13% of those being available for heavy-duty vehicles². While the initial viable network projects there will be a stronger need for hydrogen stations by 2035, the current data shows electric stations significantly outnumbering the number of hydrogen stations. While we understand that the proposed initial viable network projection is meant to be simply an estimate of future demand, we ask that this projection remains unbiased and is often updated to ensure that the viable network projections are as accurate as possible.

Lastly, we understand the limitation of not being able to use the Low Carbon Fuel Standard credits program to fund the construction and operation of zero-emission stations. However, given that the transition to zero-emission is essential to solving our air pollution and climate crises, California needs to make available as many funding opportunities as possible for the construction of heavy-duty zero-emission infrastructure. The Coalition for Clean Air is currently working with the California Air Resources Board to encourage them to create an infrastructure crediting provision for fueling of medium and heavy-duty zero-emission vehicles and we encourage the CTC to continue pushing for it as well.

We would like to extend our thanks once again to the CTC staff for incorporating all stakeholder voices in the development of this assessment. We support the findings made in the SB 671 Clean Freight Corridor Efficiency Assessment and urge for its adoption once the document has been finalized.

Sincerely,

Sofia Rafikova
Policy Advocate

² *California Energy Commission* (2023) Electric Vehicle Chargers in California.
<https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/electric-vehicle>