



May 26, 2021

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Coalition for Clean Air support for Electrify America's Cycle 3 Investment Plan

Dear California Air Resources Board (CARB) Members:

Coalition for Clean Air supports Electrify America's Cycle 3 California ZEV Investment Plan. This significant, \$200 million investment in California over 30 months will bring the state closer to achieving its climate commitments and improve air quality by transitioning to zero emission transportation, including in transit and heavy-duty applications.

Founded in 1971, Coalition for Clean Air works to protect public health, improve air quality, and prevent climate change. Despite California's longstanding climate leadership, the state faces significant air quality challenges. California dominates the list of most polluted cities in the American Lung Association's "State of the Air" report. Multiple air basins in the state fail to meet state and federal air quality standards. Communities near goods movement corridors are plagued by highly toxic diesel particulate matter (DPM), a known carcinogen.

This is the third of four investment cycles by Electrify America, which is investing \$800 million over 10 years to accelerate transportation electrification in California. The Cycle 3 ZEV Investment Plan will continue to expand access to zero emission vehicles (ZEV) in California by further building out ultra-fast charging infrastructure in metropolitan areas and along highway corridors, supporting transit and medium- and heavy-duty fleet charging, and continuing to invest in brand neutral education and awareness efforts, including supporting and sponsoring the ZEV education and training of other organizations. Building out freight and transit charging infrastructure is especially important in improving air quality in disadvantaged communities. Further, focusing on vulnerable communities "future-proofs" them during the transition to zero emission modes of transportation.

Importantly, the plan continues to prioritize rural, disadvantaged, and low-income communities for investment, to ensure that all communities can access charging and benefit from the transition to electric vehicles. Prior Electrify America funding has helped to support and accelerate activities making zero emission vehicles more accessible and affordable in these communities. Among other activities identified in the Cycle 3 Plan, Electrify America will make a \$25 million

investment in a Green City program in the Long Beach-Wilmington community, home to the nation's busiest port complex and served by a fleet of more than 18,000 drayage trucks. This targeted investment to support electrification of transit and medium and heavy-duty vehicles in this predominantly disadvantaged and low-income community will advance CARB's priorities to transition buses and drayage trucks to ZEVs and reduce pollution in a community that is classified as extreme non-attainment under the Clean Air Act.

Ensuring that all communities have access to clean transportation is a cornerstone of Coalition for Clean Air's work. This need is particularly acute in the Long Beach-Wilmington area, which has some of the most polluted communities in California. Though the entire South Coast Air Basin has elevated levels of DPM, the situation is most severe in the harbor communities. This is **in addition** to having the smoggiest air in the nation. The air quality challenges in the Long Beach-Wilmington community are so dire, they were included as a Year 1 community for AB 617's (C. Garcia, 2017) Community Air Protection program. Given this, we believe CARB and Electrify America should consult and work with the Wilmington, Carson, and West Long Beach AB 617 Community Steering Committee during the Plan's implementation. This will ensure investments work together with community-identified priorities and strategies, maximizing both programs' effectiveness.

In addition to working with the local AB 617 Community Steering Community, we also recommend:

- The Cycle 3 California ZEV Investment Plan should exceed AB 1550's (Gomez, 2016) requirement that 35% of funds are spent in disadvantaged and low-income communities. This will ensure the Plan's consistency with the California Climate Investments program and commitment to climate equity.
- Electrify America should work directly with and solicit guidance from Transportation Network Company (TNC) drivers, particularly low-income drivers. As noted in the proposed Plan, many TNC drivers are low-income earners, creating a financial barrier to electric vehicles and charging infrastructure. With the recently passed Clean Miles Standard regulation, low-income TNC drivers will need greater, hands-on assistance transitioning to cleaner vehicles. Further, the Plan should take into consideration the needs of owner-operators and small fleets in the medium- and heavy-duty sector.

Electrify America's investments are creating economic opportunity for many stakeholders. For example, responding vendors to Electrify America's 2020 survey identified more than 8,000 workers employed by themselves and subcontractors that worked on Electrify America projects from July to December 2020, including 1,022 workers in California. Of these workers, vendors reported that 62% lived in low-income and disadvantaged communities.

We respectfully urge you to find that Electrify America's Cycle 3 California ZEV Investment Plan is consistent with requirements at your June 24th meeting, in order not just to keep California on the forefront of, but a leader in, the fight for clean air for all.

Respectfully,

A handwritten signature in black ink, reading "Christopher Chavez". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Christopher Chavez
Deputy Policy Director