



5/28/21

California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: Support for Electrify America's Cycle 3 Investment Plan

Dear California Air Resources Board Members:

I am writing on behalf of CALSTART in support of 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 emissions goals to combat climate change and improve air quality by transitioning to zero emission transportation, including in transit and heavy-duty applications.

CALSTART brings 28 years of experience in the clean transportation and technology sectors. With headquarters in Pasadena, CA, and a staff of 80+ across several U.S. offices, CALSTART's mission is working nationally and internationally with businesses, governments, and communities to develop clean, efficient transportation solutions. From technology firms to transit operators and from vehicle manufacturers to research institutions, we connect every element of the clean energy sector, offering customized services, information, and programming.

CALSTART has developed and is managing several innovative and influential clean transportation programs in California that promote transportation electrification:

- The California Air Resources Board's (CARB) Hybrid and Zero-Emission Truck and Bus Voucher Incentive Program (HVIP) promotes the uptake of early-market clean medium- and heavy-duty (MHD) commercial vehicles through an innovative voucher system that reduces the upfront cost of eligible vehicle technologies, including electrified vehicles.
- CARB's Clean Off-Road Equipment (CORE) program builds on HVIP's successful design to offer point of sale incentives for zero-emission freight equipment for several off-road categories. These off-road applications support CARB's goals of reducing emissions from all transportation sources and of supporting air quality improvement in areas such as ports and warehouses that are typically located near disadvantaged communities.
- Through the Transforming Trucks Transforming Communities initiative, CALSTART is working with government, industry, and communities to engage with small fleets to support meaningful outreach, technical assistance, and partnership development to help enable cost-effective MHD ZEV adoption.
- CALSTART is developing the nation's first zero-emission infrastructure incentive project, the Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles (EnergIIZE Commercial Vehicles), directly targeted at MHD vehicle electric charging and hydrogen fueling stations. This program supports the California Energy Commission's efforts to increase and accelerate zero-emission commercial vehicle adoption by making infrastructure more affordable and accessible.
- CALSTART is supporting the deployment of several CARB-funded Zero- and Near Zero-Emission Freight Facilities (ZANZEFF) in pilot projects located at California ports and warehouses that are exploring and demonstrating commercialization pathways for several zero-emission technologies. These programs are supported with substantial private investment and highlight how multiple zero-emission technology companies can develop a clean vehicle ecosystem.

**Clean Transportation
Technologies and Solutions**

www.calstart.org

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- In partnership with utilities, industry, state and federal government, and commercial fleets, CALSTART is leading regional and national efforts to advance alternative fuel corridors to support electrification at strategic locations along freight corridors in CA and the U.S. to enable MHD ZEV adoption.

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. 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.

Among other activities identified in the plan, Electrify America will invest \$25 million 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 quickly transition buses and drayage trucks to ZEVs, and quickly reduce pollution in a community that is classified as extreme non-attainment under the Clean Air Act.

Electrify America's Cycle 3 investments represent a continued effort to support improved air quality in disadvantaged communities, develop economic opportunities in clean transportation technologies, and accelerate the zero-emission vehicle market. This proposed investment targets, among other activities, electrification efforts for commercial vehicles near ports. Such an investment is consistent and supportive of CARB strategies, such as Project 800, the push to deploy 800 drayage trucks by the end of 2021 and to continue that momentum for drayage and freight trucks. This investment and others cited in the Cycle 3 proposal will create cleaner air in disadvantaged communities and support the growth of the zero-emission commercial vehicle market in California and beyond.

Respectfully,

Alycia Gilde
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