

July 2, 2020

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

**Re: 2020-2023 Clean Transportation Program Investment Plan Update**

Dear Commissioner Monahan:

Thank you for the opportunity to provide comments on the Lead Commissioner Report for the Clean Transportation Program spending plan for 2020-2023. The American Lung Association views this program as a critical tool for improving and protecting public health against harmful transportation pollution. As a member of the Advisory Committee, I appreciate the efforts to update the plan considering opportunities to support recovery from the impacts of the COVID-19 lung health pandemic and your framing of the June 19<sup>th</sup> Advisory Committee meeting within the national dialogue on race and equity.

California is home to the most difficult air pollution challenges in the United States, with 98 percent of residents living in communities impacted by unhealthy air. These air quality challenges are dominated by transportation pollution, and many communities and populations are at increased risk and vulnerability to the negative impacts of fossil fueled-transportation combustion, including lower income communities and communities of color. Transportation is also the leading source of greenhouse gas emissions that cause climate change that amplifies a wide range of health risks facing our most vulnerable and pollution-affected communities. As our climate changes, the job of cleaning our air and preserving hard-fought clean air progress becomes more difficult as extreme heat, wildfires and other harmful conditions increase.

The Clean Transportation Program is an important tool in confronting the negative effects of transportation systems on public health and our climate. We offer the following comments as follow-up to those made during the Advisory Committee meeting:

- **Support for front-loading and prioritizing zero emission transportation** The widespread and rapid transition to zero emission technologies – and enabling infrastructure – envisioned in the Clean Transportation Program report is necessary to achieving health protective clean air and climate standards. As noted in the report, transportation sources generate the largest share of harmful ozone- and particle-forming NOx emissions in California and approximately half of California’s greenhouse gas emissions that drive our climate health crisis. The transition away from combustion toward zero emission technologies is vital to achieving clean air and a healthy climate for all Californians. This is especially true in the medium- and heavy-duty sectors that dominate the NOx emission inventory.
- **Support for multi-year approach** The American Lung Association strongly supports the focus on creating multi-year certainty for the planning and deployment of the infrastructure needed to support and accelerate the transition to zero emission

transportation solutions. We appreciate the near-term front-loading of investment in closing current gaps in light-duty infrastructure while also ramping up essential investments in the heavy-duty infrastructure needs in the near-term.

- **Direct investments to California's most disadvantaged communities** As discussed by many members of the Advisory Committee, the Clean Transportation Program investment plans should solidify thresholds for targeted investment to reduce pollution burdens in California's most disadvantaged communities. We appreciate that the Commission's attention to equity and that "nearly half of site-specific Clean Transportation Program funding is in or benefitting disadvantaged communities." We encourage the Commission to take the next step and solidify a minimum 50 percent threshold for funding throughout the plan. We applaud the work of the Disadvantaged Communities Advisory Group in the CTP process and encourage close coordination with the group on identifying appropriate tracking metrics, thresholds and broader community needs to achieve a healthy, equitable and sustainable zero emission transportation system.
- **Focus on streamlining investments and infrastructure project deployment** Within each plan targeted to accelerating the deployment of clean air solutions, the issue of timing is always a concern. We encourage the Commission to work toward identifying, awarding and realizing the health benefits of approved projects as expeditiously as possible. From achieving targets for 200 hydrogen-fueling stations and 250,000 battery-electric vehicle by 2025, to meeting heavy-duty electric charging infrastructure needs to support growth in demand set forward by the recent adoption of the landmark Advanced Clean Trucks rule by CARB, ensuring support for a continuous pipeline of completed projects will create market certainty and growth of the zero emission sector.
- **Support for coordination with implementation of Sustainable Communities Strategies** We greatly appreciate that the Plan notes the importance of coordinating zero emission transportation investments with plans to implement the Sustainable Communities and Climate Protection Act of 2008 (SB 375; Steinberg). Sustainable transportation must take the holistic view of increasing zero emission technologies alongside efforts to reduce vehicle miles traveled as a critical metric for achieving clean air and climate standards. The health benefits of this joint approach will ensure cleaner air and healthier alternatives to driving that can promote daily physical activity health benefits ranging from reductions in obesity-related diseases to mental health impacts to heart disease and cancers. We encourage the Commission to continue to prioritize the integration of zero emission transportation and mobility choices within the fabric of healthier and more sustainable communities envisioned by SB 375.

The American Lung Association looks forward to continued engagement on this important program. We thank you for your work to create a thoughtful plan that advances the widespread transition to zero emission transportation solutions that reduce the burdens of unhealthy air.

Sincerely,



Will Barrett  
Clean Air Advocacy Director