

EHC's response to objections to preparing a long-term ZEV Plan:

Port staff have consistently argued that it is just not possible to prepare a long-term ZEV truck plan because of too many unknowns pertaining to the state of ZE truck technology. Port staff's understanding as to what is possible with respect to heavy-duty ZE trucks is inconsistent with CARB's analysis including the following:

- New heavy-duty ZE trucks are **commercially available for order today** from several manufactures¹ - see slide 16 (please note that this is further supported by the Port of SD's own study last year² - see page 4);
- New heavy-duty ZE trucks have a **lower cost of ownership** (TCO) starting in 2025 when compared to diesel as discussed in CARB's 9/9/2021 TCO analysis (see page 59), even when accounting for infrastructure³. CARB's TCO findings are conservative in that the analysis does not factor in grants, incentives, and/or utility infrastructure programs which can further reduce the costs to truck owners;
- **In 2023, only ZEVs may be added** to the CARB Drayage Truck Registry⁴ (see slide 33) with the proposed Advanced Clean Fleet rules; and,
- **Delivery times** for new heavy-duty ZE drayage trucks are **comparable to diesel** and new heavy-duty ZE drayage trucks can be customized to help meet local trucking demands⁵.

While the state of ZE technology and economic benefits of ZE trucks have never been clearer and are quickly getting better, the Board has the opportunity to lead on this issue to help address the severe public health crisis in the Portside communities. ZE trucks are here today and the sooner that the Port establishes a clear and measurable long-term strategy towards that end, the easier the transition will be for all stakeholders.

EHC's full set of MCAS ZEV comments on the August Draft MCAS:

EHC has previously and repeatedly recommended that the Port create a long-term ZEV plan and develop separate groups of policies and strategies to advance ZEV with respect to the varying levels of the Port's regulatory authority (e.g., policies for: 1. existing tenants; 2. new discretionary actions, including new leases; and, 3. charging infrastructure). Port staff asked that EHC propose policies/strategies for each of these three groups, which EHC subsequently did on 8/23/21. For ease of evaluating EHC's complete comments on the August Draft MCAS, below is a high-level set of comments followed by a more detailed analysis.

¹ CARB's Advanced Clean Fleets

Regulation Workshop. 9/9/2021. https://ww2.arb.ca.gov/sites/default/files/2021-09/210909acfpres_ADA.pdf

² Port of San Diego's https://pantheonstorage.blob.core.windows.net/ceqa/MCCW_Vol_1_Final_SEIR.pdf

³ CARB's Draft Advanced Clean Fleets Total Cost of Ownership Discussion Document. 9/9/2021.

https://ww2.arb.ca.gov/sites/default/files/2021-08/210909costdoc_ADA.pdf

⁴ CARB's Advanced Clean Fleets

Regulation Workshop. 9/9/2021. https://ww2.arb.ca.gov/sites/default/files/2021-09/210909acfpres_ADA.pdf

⁵ 9/1/2021 virtual meeting with CARB, EHC, Port staff and others.

