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Marissa Wu - Greenlining - Comments on 25-26 CTP Draft

Additional submitted attachment is included below.

November 7, 2025

California Energy Commission

715 P Street
Sacramento, CA 95814

Submitted electronically

Re: Docket 25-ALT-01 (2025-2026 Investment Plan Update for the Clean Transportation Program)

Introduction and Summary of Recommendations

The Greenlining Institute (“Greenlining”), works toward a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change. We greatly appreciate the opportunity to submit comments to the California Energy Commission (CEC) to guide the development of the 2025-2026 investment plan (“CTP”, or Clean Transportation Program).

In addition to previous recommendations we submitted on this plan’s guiding principles, we make the following recommendations, as summarized:

1. Invest 100% of funds into disadvantaged communities to address persistent equity gaps in electrification across California.
2. Develop metrics beyond location that ensure benefits are delivered to target communities.
3. Continue to prioritize and coordinate investments for charging for multi-family housing, renters, and medium- and heavy-duty (MDHD) ZEVs, as well as ZEV infrastructure workforce development.
4. Limit hydrogen investments to medium- and heavy-duty infrastructure and implement an equity-centered definition of green hydrogen.
5. Break down specific programs for each funding segment.
6. Ensure ample timelines for public comment and community input.

Below, please see elaborations on these recommendations:

Increasing Investments to Address Persistent Equity Gaps

We appreciate the CEC’s continued spotlight on the importance of increasing equity in California’s clean transportation transition. This remains a top priority, especially in light of recent studies demonstrating that there is still much work to be done to achieve an equitable green transition. Although California has been successful in reducing overall PM2.5 transportation emissions, relative pollution exposure inequities persisted or even worsened

across AB 617 and SB 535 communities and for people of color.¹ Furthermore, while California has invested nearly \$2B in clean vehicle incentives since 2010, only 15% of funds have reached disadvantaged communities (DACs) where electric vehicle adoption continues to lag behind.²

While the CEC has been fulfilling AB 126's mandate to direct at least 50% of CTP funds towards projects that directly benefit or serve DACs and low-income communities, environmental equity for these communities has not improved accordingly. As such, we recommend increasing investments to 100% into DACs for the 2025-26 CTP investment plan in order to expedite California's ability to address these persistent inequities. This aligns with the Luskin Center's top policy recommendation³ to close equity gaps in ZEV adoption by increasing funding for programs that specifically target low-income and disadvantaged communities.

Develop Intentional Metrics on Benefit Delivery to Target Communities

We support the intent stated in the draft plan to develop metrics beyond location that ensure benefits are delivered to target communities. While census tracts have been used as proxies to indicate disadvantaged communities per SB 535 (2012), locating ZEV infrastructure within a designated census tract is an important step towards increasing charging access for local residents, but alone does not guarantee that priority communities are reached. One way to make location a more useful metric could be incorporating additional co-location indicators to further target investments: CLEE's EV Equity Roadmap tool⁴ includes filters for siting ZEV infrastructure near low-income housing, multifamily housing, renters, and public transit, for example.

As we have written previously⁵, charging infrastructure contains opportunities to implement economic development opportunities for local communities. One economic metric to consider is quantifying the number of high road, local hire jobs created by program investments. This metric would dovetail well with the CTP's workforce development efforts.

Ideally, metrics should be quantifiable and scalable; however, we also uplift that oftentimes achieving equitable outcomes requires deep engagement and tailored approaches to individual communities that do not naturally lend to generalizable metrics. Additionally, some critical metrics, such as local environmental and health benefits from ZEV infrastructure, are quantifiable but longitudinal, taking years for outcomes to manifest. The recently-launched CalHealthMap⁶ could provide some historic longitudinal data to measure health outcomes in

¹ Libby H. Koolik et al., "[PM2.5 exposure disparities persist despite strict vehicle emissions controls in California](#)," Science Advances (September 2024)

² Rachel Connolly et al., "[An Analysis of California Electric Vehicle Incentive Distribution and Vehicle Registration Rates Since 2015](#)," UCLA Luskin Center for Innovation (June 2024)

³ See note 2.

⁴ <https://www.law.berkeley.edu/research/clee/ev-equity/mapping/>

⁵ [Marissa Wu Comments - The Greenlining Institute Comments on 25-26 Proposed Guiding Principles](#)

⁶ <https://calhealthmap.org/>

locations where CTP funds were invested in the past, and subsequently extrapolate learnings for the future.

Lastly, coordination between agencies, programs, and EVSE providers may help develop metrics that more concretely measure charger utilization rates by members of priority communities. For example, if a charge card benefit is provided to income-eligible drivers as part of a vehicle incentive program, as it was for CVRP⁷ and Clean Cars 4 All⁸, it would be feasible to track charge card utilization, such that whenever a charge card is used for payment at a charging station, we know that station has effectively reached a member of a priority population. However, we caution that data privacy should be handled carefully and input from target communities should be considered in this idea.

Prioritize and Coordinate Investments in At- and Near-Home Charging, MDHD Charging, and Workforce Development

We support the proposed plan's focus on increasing charging accessibility for residents in multi-family housing. We also want to uplift the need to increase charging access for renters, who may not be able to install at-home charging and will need to rely on public charging. We are interested in further exploring the possibility of curbside charging to fill these charging gaps near renters and multi-family residences, but highlight, per a 2024 CLEE report⁹, that "curbside and related public charging programs are not inherently equity-oriented." The report goes on to discuss the importance of prioritizing equity criteria in site selection as one way localities can intentionally embed equity into curbside charging programs. Should CEC decide to pursue curbside charging as a near-home charging solution, we encourage robust and thoughtful partnership with low-income and disadvantaged communities to ensure any proposals are inclusive of community input and are structured intentionally to deliver equitable outcomes.

On MDHD, while we understand that this year's plan was informed by considering the overall balance of past investments and open solicitations, we want to emphasize the importance of maintaining focus on MDHD investments going forward. As an overarching strategy, we support prioritizing MDHD electrification because of the goods movement sector's disproportionate impact on air pollution and on the health of DACs living near freight corridors¹⁰.

In all the aforementioned investments, we recommend that CEC coordinate with agencies including CARB and CPUC in order to streamline efforts and maximize impacts. By coordinating

⁷ <https://cleanvehiclerebate.org/en/faqs/what-cvrp-ev-charge-card>

⁸ <https://ww2.arb.ca.gov/our-work/programs/clean-cars-4-all/about>

⁹ Ted Lamm et al., "[Case Studies: City Public And Curbside Ev Charging Strategies](#)," Center for Law, Energy & the Environment (March 2024)

¹⁰ Guillermo Ortiz, "[Breathing in Harm: The Toll of Freight Pollution in California](#)," Natural Resources Defense Council (August 2024)

charging infrastructure investments with vehicle incentives and reduced utility rates, California can more effectively implement a clean transportation transition.

We support continued investments into ZEV- and charger-related workforce development and are glad to see an upcoming solicitation focused on charging equipment servicers, a necessary workforce to increase charger reliability for Californians. As previously written,¹¹ CEC has the opportunity to shape the trajectory of the green economy and encourage a just transition by incorporating labor standards and enforcement into CTP funding requirements to ensure that new clean transportation jobs being created are also high-quality, high road jobs¹² that community members from DACs can access. See UC Berkeley Labor Center's Workforce Standards Toolkit¹³ for more information.

Similarly, we recommend that CEC continues to coordinate workforce development investments across agencies with CARB and with community and labor partners to ensure that efforts are streamlined. Wherever possible, utilizing existing union pathways for training and certification can conserve state resources. We would like to reference our previous comments¹⁴ for further workforce development considerations with the CTP.

Comments on Hydrogen

Greenlining has voiced numerous concerns around CEC's hydrogen investments over the last year. These concerns persist in the 2025-26 Proposed Guidelines. We ask that CEC reference our joint letter¹⁵ on last year's CTP hydrogen investments, and specifically uplift a few key concerns.

Most pertinently, hydrogen funding should be restricted to only medium- and heavy-duty infrastructure in the CTP. MDHD creates disproportionately high levels of emissions that impact frontline communities along freight corridors. Electrifying MDHD to reduce pollution inequities across the state is a priority that hydrogen can currently support. However, light-duty hydrogen vehicles have not found widespread market success, and we do not support continuing to pour limited state funds into light-duty hydrogen when battery electric vehicles have demonstrated consumer popularity while also being more environmentally-friendly. According to the CEC's own data,¹⁶ more than 95% of hydrogen is produced from fossil fuels, which runs counter to the CTP's purpose and state climate goals. As such, Greenlining recommends that CEC limits hydrogen investments to only hard-to-electrify MDHD sectors and implements a strong, equity-centered definition that requires investments only go towards green hydrogen.

¹¹ [Marissa Wu Comments - The Greenlining Institute Comments on 24-25 CTP Updated Draft](#) (October 2024)

¹² Carol Zabin, "[Putting California on the High Road: A Jobs and Climate Action Plan for 2030](#)", UC Berkeley Labor Center (June 2020)

¹³ [Factsheet: Workforce Standards for an Equitable Economy](#), UC Berkeley Labor Center (March 2024)

¹⁴ [Marissa Wu - Greenlining - Comments on CTP ZEV Workforce Training and Development Strategy](#) (July 2024)

¹⁵ [19 Organizations on Hydrogen Concerns in 24-25 CTP Updated Draft](#) (October 2024)

¹⁶ "[Hydrogen Fact Sheet](#)", California Energy Commission (June 2021)

Additionally, we ask that undersubscribed hydrogen funds and canceled hydrogen projects should be reallocated into battery electric infrastructure.

Break down specific programs for each funding segment.

We appreciate CEC staff's thorough work putting together this draft plan and its many tables. Currently, Table ES-1, the proposed allocations for the Clean Transportation Program, illustrates high-level categories for funding segments. If possible going forward, we request that this table is broken down into the specific programs that these funding segments would go into, similar to CARB's funding plans¹⁷. This level of specificity will allow us to better match funding level to funding demand. Additionally, we echo requests from the Advisory Committee meeting for a breakdown of historic funding invested by vehicle segment since the start of the CTP, which will help stakeholders provide more helpful recommendations on whether or not the allocations are well-balanced across vehicle segments.

Procedural Comments on Public Comment Timelines

Public feedback is extremely important for ensuring that state investments are serving the communities most in need. In the past, CTP public comment periods have been as short as 8 business days, which is insufficient for advocates and community members alike to provide thoughtful feedback. In contrast, however, OAL guidance,¹⁸ which CARB and CPUC both follow, requires 45 days for written comments on proposed regulations. We encourage CEC to adopt OAL guidance going forward for public comment deadlines.

Additionally, as there is only one CTP draft open to feedback this year rather than the two drafts that there were last year, ample public comment opportunities and timelines are even more important so that stakeholders can thoroughly provide feedback.

We appreciate the opportunity to comment on the CEC's proposed investment plan. We look forward to continuing to track progress on this effort. Please do not hesitate to reach out to me (marissa.wu@greenlining.org) with any questions or to schedule time to discuss our recommendations further.

Best regards,

Marissa (Mars) Wu

Senior Transportation Equity Program Manager

¹⁷ [Funding Plan for Clean Transportation Incentives](#), CARB

¹⁸ [About the Regular Rulemaking Process](#), Office of Administrative Law