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**CEJA & CAUSE Comment on CEC Clean Transportation Investment Plan Update 21-22**

*Additional submitted attachment is included below.*



May 13th, 2021

**RE: 2021-2022 Investment Plan Update for the Clean Transportation Program**

To the California Energy Commission,

The California Environmental Justice Alliance (CEJA) is a statewide alliance of grassroots community-based organizations across California working together to advance environmental justice in state policy. Our member and partner organizations work directly with low-income communities and communities of color in some of the most polluted and socioeconomically burdened areas of our state. CEJA unites the powerful local organizing of our members to create comprehensive opportunities for change at a statewide level. Among CEJA's 10 member and partner organizations is the Central Coast Alliance United for a Sustainable Economy (CAUSE). CAUSE works to advance social, economic, and environmental justice for working-class and immigrant communities in Ventura and Santa Barbara Counties, including advocacy on reducing emissions from heavy duty transportation on the port-adjacent community of South Oxnard. Together, we offer these comments on the CEC's 2021-2022 Investment Plan Update for the Clean Transportation Program, and specifically the 2021-2023 Investment Plan Update Staff Draft Report.

Overall, we greatly appreciate the direction the CEC has taken to advance the state's climate, air quality, and equity goals through the transportation sector. The focus on medium and heavy duty ZEV infrastructure and 50% funding allocation to low-income and disadvantaged communities (DACs) are important steps forward. Environmental justice communities surrounding ports, including West Oakland, South Oxnard, Wilmington, and Barrio Logan as well as many communities impacted by growing warehouse development in the Inland Empire and Central Valley, have organized to address severe health impacts of diesel exhaust from heavy-duty trucks for many years. Shifting focus to electrifying heavy-duty transportation will provide the greatest air quality, public health, and equity benefits from state funds. Additionally, workforce and economic development opportunities connected to the buildout and deployment of this infrastructure are essential components to an electrification strategy, and we appreciate the inclusion of these.



We strongly believe that investments should be made strategically to address the root causes of transportation emissions and disenfranchisement, to create transformational changes within our transportation system that make it truly sustainable and equitable for all Californians. This includes making science-backed investments to focus on electrification (battery electric and hydrogen), not false ‘near-zero’ solutions such as biofuels, ‘renewable natural gas’, and other sources which still release pollutants in and around the communities where they are operated. This also means placing a greater focus upon intentional investments and supportive policies in DACs that mitigate threats of gentrification and displacement. Further, transformational investments require adequate accounting of costs and benefits to DACs, and should be informed by deep community engagement regarding needs. To align towards necessary transformational change to meet our state’s goals, we offer the below recommendations and encourage their inclusion in the 2021-2023 Investment Plan Update for the Clean Transportation Program.

**1. Stop investing in false ‘near-zero’ solutions, like biofuels and RNG.**

In the Investment Plan Update, the CEC recognizes that in order to meet our climate and air quality goals, funding should prioritize zero-emissions technologies. However, this is contradictory to the \$25 million 3-year investment in ‘alternative fuels’. Such investments only delay deployment of critical ZEV infrastructure, and perpetuate pollution and polluting infrastructure in DACs. When making such decisions, it is also important to account for the life cycle impacts of biofuels, particularly from feedstock production and the biofuel production process given numerous externalities. These include indirect land use changes, leaks, and resulting GHG implications, as well as high infrastructure costs. Similarly, the degree of this investment requires increasing the use of waste-based feedstocks from dairy manure, which in turn requires expanding polluting dairies which are mostly sited in DACs. While hydrogen is generally considered a zero-emission fuel, the CEC should consider life cycle impacts for hydrogen produced from biofuels, and prioritize investments in electrolysis generated hydrogen. Finally, the processing of municipal solid waste (MSW) can also cause pollution to surrounding areas, and especially in DACs where such facilities are often sited. These examples demonstrate the need to consider the lifecycle air and water quality impacts of such energy resources, especially in already overburdened DACs. The state’s climate and equity policies require consideration of these externalities; if they are adequately accounted for, investment in ‘alternative fuels’ becomes further contradictory to these goals, and should be reallocated elsewhere.

**2. Quantify benefits to DACs based upon social costs and community needs.**

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Serious investment needs to be made to conduct adequate community engagement to fully consider benefits, social costs, and community priorities regarding clean transportation. Quantification of costs and benefits to communities is critical to understanding the impacts of ongoing investment, such as installation of a charging station. It is important to know the implications of such actions on public health, economic development, and overall access to such technologies in DACs. Additionally, we would appreciate detailed analysis, including quantified costs and benefits, related to the impacts of the newly launched IDEAL Community Partnership program to ensure it truly addresses community needs.

**3. Invest further in community-identified, safe, and accessible ZEV public transit, shared mobility, and active transportation options - not just personal vehicles.**

To truly transform our transportation system into something more sustainable and equitable, we cannot focus solely on decarbonizing a system of individual vehicle ownership, but rather need to focus investments in more low-cost and free mass transit and shared mobility options, including active transportation. We encourage the CEC to prioritize investments in ZEV infrastructure that supports shared and public transit, like bus yards and transit centers, in addition to rural vanpools or rideshares. This is especially critical for low income communities and communities of color because the transition to a clean transportation system poses serious costs and barriers to mass individual EV ownership. Reducing these burdens includes improving access to mass transit, shared mobility, and active transportation particularly near multifamily housing. Further, investments in rural and low-income communities must be of high-quality and meet their identified needs.

**4. Ensure that all transportation infrastructure investments are coupled with strong anti-displacement and 'do no harm' policies that prioritize existing communities' needs.**

Given the statewide housing crisis, the CEC must be especially mindful of inadvertent gentrification in neighborhoods around fast chargers and other ZEV infrastructure. Real estate developers and landlords will increasingly see proximity to fast charging stations as an asset, which will quickly increase the price of surrounding land, likely resulting in raised rents and evictions. Further, new ZEV infrastructure must be deployed mindfully to ensure it does not encourage additional new development of warehouses and other polluting sources near chargers in DACs. We also encourage the CEC to prioritize charging investments in neighborhoods near permanently affordable public and nonprofit housing that are more protected from the displacement risks of the private housing market.



Additionally, preference should be given to investments in communities where jurisdictions have existing strong anti-displacement policies already in place that demonstrate planning efforts to protect communities from harmful facilities, including by ensuring that facilities are sited away from communities or have truck rerouting plans in place.

As environmental justice organizations, we commend the CEC on the direction of its Clean Transportation Investment Plan. We believe that fundamentally transforming our transportation system is one of the most important paths to advance environmental justice in California. Eliminating the deadly emissions from freight moved through California while making clean mobility affordable and accessible to all will improve health and save lives in environmental justice communities across the state. We look forward to continued partnership in advancing clean, equitable, and healthy transportation in California.

Respectfully,

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