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**The Greenlining Institute Comments\_CEC ZEV Infrastructure Plan  
Workshop**

*Additional submitted attachment is included below.*



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February 4, 2022

To: California Energy Commission

Docket No. 21-TRAN-03

Submitted via electronic commenting system for docket 21-TRAN-03

Re: ZEV Infrastructure Plan Workshop

## Greenlining's Vision for Charging Infrastructure Deployment

The Greenlining Institute (“Greenlining”) commends the California Energy Commission for seeking guidance that promotes equity and urges the prioritization of equitable charging infrastructure deployment in the hardest to reach communities as a key effort. To date, electric vehicle charging investments have historically been deployed in well resourced, early adopter, higher income census tracts or “low hanging fruit” areas. Through a profit driven deployment strategy, low income communities of color are being left behind while continuing to face disproportionate pollution burdens. If done correctly, the CEC can capitalize on this opportunity to deploy charging infrastructure in communities affected first and worst by climate impacts, lead other states, not only align but surpass Justice40 goals, reach the IJJA goal of 500,000 new chargers by 2030, and create opportunities for low-income and disadvantaged communities to participate in a burgeoning green economy.

## ZIP Must Promote The Public Interest and Advance Racial Justice

### Accountability and Alignment to Equity

To meaningfully address equity in transportation electrification efforts the same rigor applied to market studies and technology improvements in charging infrastructure must be applied to equity. Clear direction on how to not only reach but continue to surpass CEC’s 50% investment in disadvantaged communities must be explicitly stated.

#### Goals:

- Explicitly define equity and identify communities that ZIP aims to benefit. Though disaggregated data is scarce and arduous to come by, it is a tenant of equity to be as explicit and specific as possible when identifying *who* is being served. Understanding exactly who is in most need of charging infrastructure investments and accompanying benefits first is imperative for achieving equity. For example, if we can determine that Black renters in a given census tract are in greater need of EV charging, referring to that population as “low income communities of color” is not useful and only serves to agglomerate various populations and their idiosyncratic needs into a monolith.
- Deliver direct and meaningful benefits to communities. It is insufficient to funnel investment to disadvantaged communities (DACs) and low income communities without thoroughly examining the direct outcomes and benefits that plan on being achieved to meet specific community’s needs. In fact, distributing charging infrastructure deployment dependent on utility

rate payer funds without due diligence and unexpected benefits is reckless investment and should therefore be avoided by meaningfully addressing explicit community needs determined through an equitable outreach process.

- Target funding to frontline communities. Similar to the aforementioned recommendation, to achieve equity it is crucial to commit to the tenet that those with the most needs, largest resource gaps and hardest hit by poverty and pollution must be prioritized. Frontline communities are low income people of color that experience “first and worst” consequences of climate related damage with minimal resources and massive vulnerability. It is for these reasons that funding should be targeted and prioritized to reach these populations who consistently bear the brunt of our society’s externalities and have been neglected for generations.
- Promote objectives that generate multiple benefits. While not always feasible, where possible it is best to always promote objectives and agendas that create various benefits to maximize benefits and ideally tackle the multi-pronged and deeply rooted barriers that exist in disadvantaged communities. See [Clean Mobility Equity: A Playbook– Lessons from California’s Clean Transportation Equity Programs](#) to learn more.
- Integrate climate adaptation and climate mitigation efforts. As our environment faces compounding climate change consequences, our solution oriented policies should integrate both climate adaptation and climate mitigation efforts. Mitigation aims to tackle the causes of climate change and minimize possible impacts, whereas adaptation strives to reduce the negative consequences and take advantage of changes that arise as a result. With this in mind it is ideal to design environmental policies that consolidate both approaches to accelerate our solutions.
- Include displacement avoidance language. With economic driving forces changing demographic and density trends, gentrification and displacement are growing consequences. Places that were once home to low income communities of color for generations are now riddled with real estate speculation, land value appreciation and insurmountable costs of living that have led to displacement, suburbanization of poverty and extreme commuting. Given the power that policy has to sway behavior it is paramount that language in CEC efforts and EV charging deployment goals are intentional in their description of place and include strategic planning to avoid displacement as an externality.

### **Operationalizing Equity: How to Make Equity Real**

For the past 29 years, The Greenlining Institute has dedicated efforts to operationalize equity resulting in our own guidance for how to make equity real. As a result we created a guidebook titled, [“Making Equity Real in Climate Adaptation and Community Resilience Policies and Programs Guidebook”](#). The following are best practices and recommended applications of this guidebook for guidance on equitable EV charging deployment.

- 1.) **Embed Equity in the Mission, Vision and Values:** This calls for guidance to explicitly define “equity”, state a commitment to equity through mission and value setting, and specifically identify the disadvantaged communities they seek to target.
  - Define “equity” within an EV charging infrastructure context

- o Greenlining definition of “Racial Equity”: Transforming the behaviors, institutions, and systems that disproportionately harm marginalized communities. Equity means increasing access to power, redistributing and providing additional resources, and eliminating barriers to opportunity, in order to empower low-income communities of color to thrive and reach their full potential.
  - Define “benefit” within an EV charging infrastructure context
    - o Greenlining recommends using [2018 Greenhouse Gas Reduction Funds Funding Guidelines for Agencies that Administer California Climate Investments](#) define as: Potential evaluation criteria to determine whether projects provide direct, meaningful, and assured benefits to priority populations
  - Explicitly identify and define communities that the policy or program aims to benefit
  - Deliver direct and meaningful benefits to communities
  - Target funding to frontline communities
  - Promote objectives that generate multiple benefits
  - Integrate climate adaptation and climate mitigation efforts
  - Include displacement avoidance language
  - Ensure a community driven approach to developing the mission, vision and values
- 2.) **Build Equity into the Process:** Include processes that deeply engage community members to learn about their priorities, needs and challenges to adapting to climate impacts, otherwise known as a Community Needs Assessment. This step is also a key recommendation in the [California SB 350 Transportation Barriers Study](#) and as such must serve to directly inform proceeding implementation strategies. The information gathered should inform the development and implementation of the policy or program. Given this best practice we suggest the strategies below:
- Promote Authentic and Meaningful Community Engagement
  - Require Community Engagement for Feedback on Draft Plans and Program Guidelines
  - Require Community Engagement for Implementation of Plans and Program Projects
  - Promote Authentic and Meaningful Community Engagement for Grant Programs
  - Include Community Engagement Spectrum and Activities
  - Organize a Listening Tour to Gather Community Input
  - Include Cultural Considerations such as language and local history
  - Engage State Agencies with Experience Working with Frontline Communities
  - Include Technical Assistance and Capacity Building to Achieve Equitable Outcomes
  - Dedicate Funding for community engagement, outreach, capacity building, technical assistance, and workforce development
  - Develop Committee with EJ, Equity and Community Members that are compensated, hold decision-making power and provide direct feedback on process and implementation process.
  - Require Applicants to Develop Plans for Community Engagement, Workforce Development, Climate Adaptation and Resilience, and Displacement Avoidance
  - Promote Transparency
  - Include Members with EJ And Equity Expertise on Application Reviewing Committee
  - Promote Equitable Budgeting Practices in Policy Development such as funding planning activities, advance payment, and dedicated funding to priority policy outcomes
  - Conduct an assessment of federal and state transportation agencies’ readiness to begin equitable community engagement work (i.e. Does our staff have an understanding of institutional racism,

power, and systems change? Does our organization's management and leadership support the use of an equity lens? Does our team have existing relationships with community groups? Does our team have trust with the community?).

- Ensure that the priority populations are defined and consistently considered in all equity investments and their associated tasks and outcomes.
- Consider the differing mobility needs of communities by geography. With an understanding that urban, suburban and rural communities face different transportation barriers and therefore differing priorities and applications of equity, it is imperative that guidance recognizes this distinction. Where single occupancy electric vehicle incentives may be appropriate in one community, micro mobility or public transit may be best in another. It is through this idiosyncratic recognition that equity is most successfully realized. To address this, The Greenlining Institute published the [Mobility Equity Framework](#), a step-by-step guide to a more community-centered transportation planning process that focuses on the mobility needs of communities and puts affected communities at the center of decision-making. It includes specific metrics to help evaluate mobility from an equity and community-centered perspective to help transportation planning focus on the needs of people, rather than car-centric infrastructure, as well as ideas for how to develop a people-based transportation planning process.
- Require outreach staff and their leadership to participate in equity and community engagement training and workshops. It is best practice to ensure participants in engagement efforts are culturally competent and well educated in their understanding of equity to build trust and via that effort most accurately and abundantly address community needs.
- Ensure transparency throughout all steps of the funding allocation and budgeting process. To strengthen this commitment, it is essential to clearly show proposed funding allocations for equity specific priorities. We encourage transparency in every step of the process as a best practice and recommend participatory budgeting strategies for consideration— a process in which community members determine how to allocate and spend public funds; this can be used as a tool for community empowerment and to assist in trust building efforts. The California Environmental Justice Alliance (CEJA) provides extensive resources in their “SB 1000 Implementation Toolkit”<sup>1</sup>, a toolkit for guidance on SB 1000<sup>2</sup>, which requires local governments to identify disadvantaged communities in their jurisdictions and address environmental justice in their general plans.
- Develop criteria/ standards for the discretionary grant program selection process of local Community Based Organizations (CBOs) or institutions to hold local administrators accountable to desired equity outcomes, ensure their own internal and external processes are equitable, and their staff exhibits readiness to engage with community members. Recognizing that the level of outreach will differ across states, establishing a high bar for what community engagement looks like standardizes equity requirements for grant applications. This is particularly important for evaluation and measurements of outreach efficacy in the analysis phase. We strongly recommend the CEC to consider what this standard looks like to set expectations for a high functioning and most effective local partnership.

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<sup>1</sup> <https://caleja.org/2017/09/sb-1000-toolkit-release/>

<sup>2</sup> [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201520160SB1000](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1000)

3.) **Ensure Equity Outcomes:** The implementation of the guidance must lead to equity outcomes that respond to community needs, reduce climate vulnerabilities, and increase community resilience. The relationship between steps 2 and 3 should ensure investments are addressing community identified needs gathered in step 2. Outcomes include improved public health and safety, workforce and economic development, etc. Equitable implementation also requires that the process identifies and minimizes unintended consequences that may arise from the implementation process such as displacement and gentrification. The racial wealth gap remains one of the biggest economic inequities created by this country's structurally racist past and present. The racial wealth gap has left low-income communities of color with some of the most polluted air and water, plus a lack of climate investments that could create healthier communities, quality job opportunities, and innovative programs that reduce the cost of basic necessities. We recommend developing implementation strategies that work to reduce the racial wealth gap by advancing the health and wealth of underserved communities.

4.) **Measure and Analyze for Equity:** The final step to operationalize equity is to measure how equity has progressed and examine to what extent equity goals were achieved. Operationalizing equity calls for policies and programs to regularly evaluate their equity successes and improve the effort going forward. Assess whether outcomes were responsive to the respective needs identified in the community needs assessment conducted out of Step 2 and if the outcomes reflected the guidance on equity's purpose. In March of 2021 Greenlining published [Clean Mobility Equity: A Playbook– Lessons from California's Clean Transportation Equity Programs](#) to do just this. The report reviews California's clean mobility equity programs, noting successes, pitfalls and areas for improvement. It serves as both a guide for California as we continue evolving our clean mobility programs to more meaningfully center equity and as a guide for other states and the federal government as they move to develop and implement clean transportation equity programs. We recommend the following principles:

- Include Evaluation Guidelines
- Include Language in Guidelines about Developing Equity Indicators
- Provide Applicants with Resources on How to Develop Indicators
- Share Best Practices and Lessons Learned from Grant Programs
- Promote Transparency and Accountability

### **Removing Barriers to this Burgeoning Green Economy**

The emerging Green Economy presents an opportunity to create new forms of wealth building and allow communities of color that have been locked out of intergenerational wealth to capitalize from federal electrification and transportation investments. The Greenlining Institute anticipated this thriving new green economy as one where communities regardless of race and income can build wealth and as a result we published guidance on how to undo the legacy of redlining through equitable community investment standards. In the [Greenlined Economy Guidebook](#) “we imagine that these standards could be applied to community investments by diverse actors, including public agencies, philanthropic organizations, private investors or community-based organizations advising or developing their own investment strategies.” We strongly recommend EV charging infrastructure deployment and investments guidance considers the Six Standards for Equitable Community Investment:

1. **Emphasize race-conscious solutions.** Race-conscious policies like redlining and urban renewal got us to this point, and race-neutral approaches can't fix the underlying inequities. Investment needs to target and prioritize the most impacted communities.



2. **Prioritize multi-sector approaches.** Programs may be siloed, but problems are not. We need to prioritize approaches that address multiple issues and sectors at once.
3. **Deliver intentional benefits.** Benefits cannot trickle down to communities; they need to go directly to the people in the most impactful ways, while avoiding increasing or creating new burdens.
4. **Build community capacity.** Long-term disinvestment and discriminatory policies can erode a community's capacity for leadership, organizing or political capital. Acknowledging the ways that structural racism has impacted the capacity of communities of color to undertake community development projects is a key part of improving investments.
5. **Be community-driven at every stage.** Lifting up community-led ideas and sharing decision-making power is an important element of truly community-centered investment. Community members and organizations should be part of every phase of the project or policy, from goal-setting to analysis.
6. **Establish paths toward wealth-building.** We need community ownership of assets and opportunities to continue building wealth. In a Greenlined Economy, as many people as possible should be able to participate in wealth building, which will include a broader set of pathways beyond homeownership with lower barriers to entry.

### Benefits to People Not Place

As a member of the Charge Ahead coalition, The Greenlining Institute has continued to advocate for strong equity provisions that result in benefits reaching people, not just place. In an effort to do so we supported [SB 726/ AB 1389](#) requiring the California Energy Commission to: "Starting with the 2022-2025 investment cycle, and for each investment cycle thereafter, the commission shall expend at least 50 percent of the moneys appropriated to the Alternative and Renewable Fuel and Vehicle Technology Program on programs and projects that directly benefit or serve residents of disadvantaged and low-income communities and low-income Californians, and at least 50 percent of funding for tangible location-based investments shall be expended in disadvantaged and low-income communities. Any of the funds used for investments that fulfill both criteria shall count toward both criteria". The explicit language to ensure benefits are direct, meaningful and assured derived from continually seeing charging infrastructure be deployed in census tracts classified by CalEnviroScreen as "disadvantaged" but in application realizing that many of those chargers while technically in a DAC tract are in an industrial zone, an private office or campus parking structure accessible only by employees or off of major highways and corridors that wealthier commuters use but no local residents can easily access. Codifying equity language strategically holds transportation agencies accountable to their equity requirements and in doing so ensures investments are intentionally spent on creating opportunities and increasing quality of life for disadvantaged communities rather than creating stranded assets.

### Internal Equity Assessment and Readiness

Equity is a practice, not a checklist. It is a practice that must be met with dedication and consistency, and the CEC must do to it's own self assessment in preparation for true commitment to this work. We suggest the establishment of an internal office or team dedicated to advancing racial equity. In line with this suggestion, Greenlining along with over 100 organizations have recommended the establishment of a California statewide office of racial equity to address racial inequities across California and advance equitable outcomes for communities.<sup>3</sup> "The Office of Racial Equity would identify existing policies and practices in the state that contribute to, uphold, or exacerbate racial disparities and develop proposals to address these disparities. It would also enact measures to support capacity building and provide technical assistance for state agencies to

<sup>3</sup><https://greenlining.org/wp-content/uploads/2020/06/Task-Force-Recommendation-for-Office-of-Racial-Equity.pdf>



invest in strategies for racial equity, including employee training and support, development of racial equity programming, and assistance to departments to change departmental policies and practices to improve racial equity outcomes. It will lead efforts to:

- Develop a Racial Equity Framework;
- Oversee the development of agency-specific Racial Equity Action Plans that outline strategies to address racial disparities resulting from programs and policies the agency administers;
- Identify existing policies and practices in the state that contribute to, uphold, or exacerbate racial disparities and develop proposals to address these disparities, to be recommended to the Governor’s Office and Legislature;
- Analyze and report on policies in the areas of but not limited to housing/land use, employment, environment, economic security, public health and public safety that may have an impact on racial equity or racial disparities;
- Create a budget equity assessment tool to determine whether budget requests and annual allocations benefit or burden communities of color;
- Facilitate state policy reform and systems change;
- Promote community outreach and engagement;
- Collaborate with the appropriate offices to develop policies, provide technical assistance, and train agencies on maintaining a diverse, inclusive, and culturally sensitive workforce; and
- Establish, in collaboration with agencies as appropriate:
  - (a) standards for the collection, analysis, and reporting of disaggregated data regarding race and ethnicity; and
  - (b) agency-specific performance measures.
- Convene work groups consisting of agency representatives and a diverse body of public stakeholders to explore strategies to achieve the purpose of this act.”

### Data Considerations to Fill Equity Gaps and Provide Targeted Investments to DACs

We offer the following data recommendations to consider in development of equity metrics. Data from current programs in particular could play a big role in how states can target transportation electrification resources.

- *Data to Inform Equity Gaps.* Greenlining proposes that to the extent possible private and public charging entities, utilities and state transportation agencies publish current deployment and resource data to identify where gaps exist. Currently, there is no geospatial analysis of where transportation electrification investments and infrastructure have been deployed across the state. This data in combination with CalEnviroScreen data could be used to strategically fill gaps, [address charging deserts](#) and more specifically target communities impacted by both poverty and pollution.
- *Provide Lessons Learned from Charging Infrastructure Programs that Include Equity Commitment.* Along with our recommendation above, utilities, private charging companies and state agencies currently have invaluable knowledge regarding equity from charging infrastructure programs that

include equity commitments. This data should be used to inform deployment strategies, best practices and lessons learned to further improve investment in our state’s disadvantaged communities (DAC’s).

- *Federal Guidance and States Should All Share Uniform Definitions.* Given that there are various ways the terms “Equity”, “Disadvantaged Communities” (DACs) and “Low Income” we recommend staff provide a glossary of clearly defined terms and consistent terminology by which all stakeholders regardless of service area must abide by. This clarification will ensure that no miscommunication or convoluted terms and therefore investments will occur.
- *Community Engagement Guidance.* We recommend using our aforementioned four step “Making Equity Real in Climate Adaptation and Community Resilience Policies and Programs Guidebook” as a high-level guide for how to properly take part in community engagement and reap the most benefits for communities.
- *Deployment Targets:* - Equitable deployment efforts increasingly must move beyond “coordination and alignment” and include “integration and partnership” to truly ensure all targeted efforts in disadvantaged and low-income communities are seamlessly benefiting low-income people of color.
- *Consider Emerging Data Sets:* It is necessary to consider additional data sets that speak to relevant deployment, public health, diversity, land use and climate change data. Expanding data and creating flexibility to consider emerging data is particularly crucial for the both state and federal infrastructure timelines. Incorporating innovative, emerging and revisited information will ensure deployment success both technologically and socially. The following are data recommendations to consider:

- [SB 1000 data](#)

- The California Energy Commission released preliminary results addressing the issue of deployment vs accessibility.<sup>4</sup> According to, “Electric Vehicle Charging Infrastructure Deployment Assessment” the CEC was tasked with “Assessing whether charging station infrastructure is disproportionately deployed...using parameters that include population income, population density and geographical area to inform proportionate deployment of charging station infrastructure and guide the allocation of program funding for transportation solicitation”. The issue pertaining to deployment vs accessibility is one that Greenlining strongly urges the CEC to consider as a topline priority. While deployment data may point to the existence of charging infrastructure in DACs, it does not present evidence that individuals who would be considered low income or people of color are the ones accessing the infrastructure located in a DAC designated census tract. In other words, the deployment of charging infrastructure geographically may be perceived as equitable due to its location but may not be serving priority populations due to the census tracts zoning (industrial, commercial, etc) where it may be hard to reach. In other cases, the deployment may be aimed in DAC census tracts where high income populations have most access due to its proximity to job centers.

- Covid-19 data<sup>5</sup>

- The havoc of the Covid-19 pandemic has reached unprecedented and disproportionate infection and death rates as well as rippling consequences to our economic and social establishments. We have seen our institutions fail to respond swiftly and equitably to the

<sup>4</sup>[https://www.energy.ca.gov/sites/default/files/2020-06/June%2010%2C%202020%20CEC%20SB%201000%20Workshop%20Presentation\\_ADA.pdf](https://www.energy.ca.gov/sites/default/files/2020-06/June%2010%2C%202020%20CEC%20SB%201000%20Workshop%20Presentation_ADA.pdf)

<sup>5</sup><https://covidtracking.com/race/dashboard>

once looming threats we now tread and which continue to threaten our livelihoods everyday. To fail to acknowledge the ways in which transportation electrification efforts are tied to this public health crisis is to deny the responsibility the CEC has to assuage health disparities. The CEC must recognize its ability to address both Covid-19 and racial injustice pandemics through transportation electrification and energy levers that only it can pull. The Greenlining Institute recommends considering Covid-19 data in the deployment of both funding and charging allocations and in equity design.

- Land Use, Zoning, Demographic Trends and Climate Change Data
  - Considering land use and zoning maps to better apply a cost benefits analysis of charging infrastructure deployment is crucial for feasibility and determining accessibility. We recommend including this data in equity processes to assess how land use practices and zoning will impact housing, commercial, office and industrial development and therefore access to charging infrastructure.
  - Similarly, to execute targeted deployment and remove barriers to EVSE access, studying demographic projections is crucial for equity especially within the bounds of charging deployment's multi-year timeline. Understanding where populations are moving to in the face of gentrification, economic and climate displacement and the suburbanization of poverty will reveal *where* communities of color and low income residents will be by the time the charging infrastructure is shovel ready and useful.
  - In order to continue to mitigate and prolong the effects of climate change through policy it is essential to understand and embed current and projected climate induced landscape changes into California's transportation electrification plans. Using sea level rise data and flood maps that determine where land will be submerged must be analyzed along with fire risk data, particularly while working with utilities that have failed to protect residents during heatwaves and have authorized power shut offs during an already difficult global pandemic. Anticipating how geography will change as a result of fire and flooding will better inform where to deploy infrastructure, where to allocate resources, which populations are most at risk and therefore in need of targeting investment, including climate mitigation efforts.

## Additional ZIP Equity Considerations

### Customers Without Access to Home Charging

The Greenlining Institute encourages a greater expansion of strategies to ensure customers without access to home charging are able to receive it. However, it is imperative that guidance also clearly defines equity metrics to determine which "customers" are being referred to when distributing home charging, particularly as not all multi-unit dwelling residents are low income and not all single family home residents are high income earners. These metrics should align with coordinated definitions of "disadvantaged communities" and should consider pathways to both affordable EV charging for low income homeowners and renters that seek on-site charging. For households that cannot afford the upfront cost of hardware installation, service models that involve perpetual cost recovery charges and no path to ownership is not acceptable when wealthier households that can pay upfront are assured a path to ownership from the onset.

## Medium and Heavy-Duty Vehicle Charging Infrastructure

Medium and heavy-duty fleets are an important sector of equitable transportation electrification and environmental justice efforts as they are responsible for the largest proportion of air pollution. Community engagement and equity principles must be included in guidance for statewide processes to coordinate medium and heavy duty multi-service area operations. Freight corridors, ports and diesel death zones are disproportionately burdening low income communities of color, exacerbating healthy disparities, increasing respiratory risks to Covid-19 and perpetuating environmental racism.

ZIP should consider lessons learned from previous and existing medium and heavy-duty programs and require coordination of zero emission medium and heavy duty goals among state transportation agencies as condition of federal incentive funding to meet inter-state and intra-agency goals. Examples of these regulations include California Air Resource Board's Advance Clean Trucks Rule and the Innovative Clean Transit Regulation.

## Charging at New Building Construction and Affordable Housing

New building construction applications as near-term priorities are necessary considerations. Greenlining recommends examining how to align charging infrastructure efforts with new building code upgrades and affordable housing developments. In "2019 [California Green Building Standards Code](#) ("CALGreen", Title 24, Part 11) requires that new construction and major alterations include adding "EV Capable" parking spaces which have electrical panel capacity, a dedicated branch circuit and a raceway to the EV parking spot to support future installation of charging stations."<sup>6</sup>

Additionally, EV charging deployment guidance should set aside priority funding for public housing sites. Residents of public and low income housing often face transit barriers due to inaccessibility, routes, frequency and affordability. To address this a few initiatives are paving the way for electric vehicle car sharing programs at affordable housing sites. In California, the transportation advocacy organization, TransForm piloted "three [mobility hubs at affordable housing developments](#) in Oakland, Richmond, and San Jose. The mobility hubs will include an electric vehicle car sharing program and a mix of additional mobility options based on residents' needs, such as transit passes and bike sharing. Residents will shape the design and implementation of the project every step of the way, to ensure that the mobility hubs are effectively tailored to each community."<sup>7</sup> At the national level Greenlining signed on to support the introduction of Congresswoman Nanette Barragan's bill that would require the U.S. Department of Energy (DoE) and Housing and Urban Development (HUD) to develop a program to provide grants of up to \$1M to public housing agencies, local governments or non-profits to support EV car sharing services at public housing projects. The bill would authorize up to \$50M in annual appropriations from 2022-2031.

## Cost-Effectiveness:

Equity investments must be considered under different standards of "cost effectiveness". "Cost-effectiveness" has not yielded equity outcomes because the cost-effectiveness formulas are not designed in a way that maximizes equity. These formulas don't take into account important approaches, like marketing, education & outreach, technical assistance, capacity building, workforce development and community engagement. In other words, equity approaches require investing in key activities like marketing, education &

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[https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Building/Sacramento-Streamline/EV-Infrastructure-Reqs-in-CALGreen-Building-Code\\_April-2020.pdf?la=en#:~:text=The%202019%20California%20Green%20Building,to%20support%20future%20in%20stallation%20of](https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Building/Sacramento-Streamline/EV-Infrastructure-Reqs-in-CALGreen-Building-Code_April-2020.pdf?la=en#:~:text=The%202019%20California%20Green%20Building,to%20support%20future%20in%20stallation%20of)

<sup>7</sup> <https://www.transformca.org/landing-page/mobility-hubs-affordable-housing-pilot>



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outreach, capacity building, technical assistance, participatory processes and inclusive workforce hiring and development. These spending categories add value and benefits to the community that cannot necessarily be measured by “number of charging ports” or other technology deployment based metrics.

### **Marketing Education and Outreach:**

In order to resource charging stations in low income communities sufficiently enough and ensure sustainable maintenance long term, market, education and outreach are a key component. Operations and maintenance are often underfunded or left for others to do after installation of chargers and equity requirements have been checked off. Education and outreach in low income communities should not be seen as exclusive from but rather a part of operations and maintenance– the more people understand how charging works and how they benefit from it the more likely they are to embrace and preserve the long term use of the investment. MEO should be considered a component of long term operations and maintenance in order to ensure chargers are being taken care of. Guidance in charging infrastructure deployment must require chargers in disadvantaged communities have a maintenance plan to make sure they are being taken care of. Through a participatory process, community members can collectively self determine the maintenance plan and create buy in for long term operations.

### **Conclusion**

We appreciate the opportunity to provide input on the Commission’s ZEV Infrastructure Plan, and look forward to working with the CEC to help promote the achievement of climate, air quality, and equity goals.

Respectfully submitted,

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