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*Comment Received From: Orville Thomas  
Submitted On: 6/28/2022  
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## **NEVI Deployment Plan Development Comment Letter**

*Additional submitted attachment is included below.*



June 28, 2022

SUBJECT: COMMENTS RE: NATIONAL ELECTRIC VEHICLE INFRASTRUCTURE DEPLOYMENT PLAN DEVELOPMENT, 2022-2026 FOR CEC AND CALTRANS (DOCKET #22-EVI-03)

Sent via email

Clean Transportation  
Technologies and Solutions

[www.calstart.org](http://www.calstart.org)

On behalf of CALSTART, I would like to thank the California Energy Commission (CEC) and California Department of Transportation (Caltrans) for their hard work in putting together a draft Deployment Plan for National Electric Vehicle Infrastructure (NEVI) Program. CALSTART appreciates the state's engagement with stakeholders to solicit input into the draft plan and recognizes the thoughtfulness toward light-duty charging needs, equity and inclusion, and technical considerations. The purpose of this letter is to provide comments on the need to include funding and deployment considerations of medium- and heavy-duty (MD/HD) commercial zero-emission vehicle infrastructure.

CALSTART is an internationally recognized clean transportation nonprofit organization focused on the commercialization of advanced technologies and infrastructure. Working together with over 300+ members including vehicle manufacturers, fleets, utilities, and infrastructure solution providers, CALSTART is dedicated to the growth of the clean transportation industry and works with public and private sectors to drive innovation, advance sustainable transportation, and promote clean air communities.

CALSTART is fortunate to work in partnership with the state of California in implementing incentive projects designed to accelerate the marketplace of zero-emission vehicles (ZEVs) and ease consumers and fleets with their transition. With over 12 years in practice, CALSTART has firsthand experience in incentive program design, industry and community engagement, technical assistance, and implementation models necessary for successful adoption of ZEVs and infrastructure.

Following the review of California's draft Deployment Plan, CALSTART would like to recommend that greater consideration be given to the **inclusion of MD/HD ZEV infrastructure needs, including investments**, given California's policies and goals to advance zero-emission passenger and commercial vehicles. MD/HD vehicles make up less than five percent of the total vehicles on the road yet produce nearly 30 percent of the total amount of carbon dioxide emissions.<sup>1</sup>

Investments in Electric Vehicle (EV) infrastructure designed for MD/HD EVs play a critical role in California addressing decades of environmental injustice. A California Environmental Protection Agency (EPA) report released earlier this year highlighted that "residents of disadvantaged communities and people of color continue to experience the highest pollution levels of particulate matter and air toxics."<sup>2</sup>

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<sup>1</sup> Department of Energy, Vehicle Technology Office: <https://www.energy.gov/eere/vehicles/fact-951-november-14-2016-medium-and-heavy-trucks-account-about-quarter-highway>

<sup>2</sup> Impacts of Greenhouse Gas Emission Limits Within Disadvantaged Communities: Progress Toward Reducing Inequities: <https://oehha.ca.gov/media/downloads/environmental-justice/impactsofghgpoliciesreport020322.pdf>

O F F I C E S I N :

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California's NEVI deployment plan should **serve as another opportunity for our state to show leadership on state-level policy and funding priorities for ZEV infrastructure.** In the same way that other states have looked at, discussed, and adopted California's Advanced Clean Truck (ACT) Rule, CALSTART believes the NEVI deployment plan will be used as a model for EV infrastructure investment planning and deployment.

In the Deployment Plan, the draft explains that the lack of investment in MD/HD infrastructure is offset by other state programs. CALSTART believes this could present two challenges; 1) on an ongoing basis, assumes the state budget will be able to fund the necessary investments in programs addressing MD/HD charging, and 2) if used as a reference by other states, could create a perception that states should prioritize light-duty without minimal NEVI investment consideration for MD/HD EV infrastructure. This could impact states that do not have standalone programs to supplement MD/HD EV infrastructure.

**CALSTART recommends the Deployment Plan include a minimum of 15 percent of NEVI funding for MD/HD.** A majority of currently operational and planned EV public charging infrastructure is focused on light-duty vehicles. The size and location of spaces reflect that policy decision. To help California advance MD/HD fleet transition to zero-emission, CALSTART recommends that 15 percent of NEVI funding be prioritized for MD/HD EV charging stations along designated alternative fuel corridors, especially freight corridors that impact nearby communities disproportionately affected by transportation emissions.

California's EPA has noted the importance of investments in MD/HD and the connection to environmental justice and public health. EPA states that "taking actions to transition from HDVs to zero-emission vehicles by 2045 could significantly reduce statewide emissions of fine particulate matter associated with HDVs by an estimated 58 percent...These reductions have the potential to avoid an estimated 3,800 premature deaths over 25 years, two thirds of which would benefit people of color."<sup>3</sup>

By designing and building charging stations specifically for MD/HD ZEVs, California can address environmental justice issues plaguing communities and accelerate economic and workforce development opportunities in clean transportation technologies. The benefits of transitioning to zero-emission are unlikely to occur unless intention is given to the build out of charging infrastructure to include MD/HD ZEV needs.

CALSTART thanks the CEC and Caltrans for their consideration of these important issues and looks forward to the joint response.

Orville Thomas  
State Policy Director  
CALSTART