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Marissa Wu - Greenlining - Comments on 2024 ZEVIP

Additional submitted attachment is included below.

February 7, 2025

California Energy Commission

715 P Street
Sacramento, CA 95814

Submitted electronically

Re: Docket 24-TRAN-03 (2024 Draft Zero-Emission Vehicle Infrastructure Plan)

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 the following comments to the California Energy Commission (CEC) to guide the development of the 2024 Zero-Emission Vehicle Infrastructure Plan (ZEVIP):

Support Targeting Investments to Address Charging 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 (EV) adoption continues to lag behind.²

As such, we emphasize that, in either the primary AB 2127 funding scenario or increased DCFC funding scenario, CEC must prioritize targeting investments towards low-income and disadvantaged communities to ensure that clean transportation infrastructure inequities and their resulting health disparities are addressed.

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)

Feedback on DCFC-Focused Infrastructure Plan Scenario

In alignment with our comments submitted October 2024³ on the 2024-2025 Clean Transportation Program Investment Plan Update:

We understand a potential advantage of the DCFC-focused “gas station model” for charging explored in this report is that it may have a comparable or lower levelized cost at scale when compared to L2 charging, depending on utilization and charger speed. However, on the driver end, DCFC is currently more expensive than L1 and L2 charging for users, and charging cost disparities over the long term could accumulate into significant financial inequities if left unmitigated. For example, if the lifetime cost of charging for a low-income renter who must rely on public DCFC is much higher than the lifetime cost of charging for a condo owner with L2 charging at home, we would have fallen short in achieving equitable clean transportation access. If the DCFC-focused charging model is implemented, we urge CEC to prioritize equitable deployment in low-income and disadvantaged communities *and* furthermore ensure that affordability is addressed for low-income drivers.

Additionally, depending on where DCFC “gas stations” are placed, they may also inadvertently funnel traffic through formerly-redlined communities. While EVs no longer produce tailpipe emissions like gas-powered vehicles, studies have shown that concentrations of secondary aerosols may increase with higher EV adoption and lead to increased mortality rates, based on particular geographies and atmospheric conditions.⁴ This should be taken into account when considering the “gas station model” to ensure that their site placements do not negatively impact the surrounding communities and exacerbate inequities. Additionally, increased traffic can increase road maintenance needs as well as traffic safety issues. CEC should look to local community engagement to further consider these secondary impacts and proactively mitigate them if the “gas station model” is implemented.

Finally, we appreciate CEC’s consideration of ancillary revenue opportunities for charging “gas stations” and we further recommend that CEC also proactively consider opportunities to implement community benefits. This could include labor standards on station construction as well as charger installation and maintenance, local and targeted hire requirements, and additional economic development opportunities that direct revenue generated from chargers towards funding local community priorities.

Feedback on Hydrogen Deployment Strategy

As previously submitted⁵, we hold serious equity and environmental justice concerns about the deployment of hydrogen. While we understand CEC’s responsibility to current hydrogen drivers,

³ [Marissa Wu Comments - The Greenlining Institute Comments on 24-25 CTP Updated Draft](#) (October 2024)

⁴ [University of Houston Study Shows Electric Vehicles Can Have Positive Impact on Air Quality and Public Health in Some Cities, Not All](#), University of Houston (June 2024)

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

we emphasize that California’s hydrogen investments should be focused on hard-to-electrify sectors, such as long-haul trucking, and exclude light-duty vehicle fueling. Furthermore, the current CEC definition of “renewable hydrogen” includes steam reformation of biomethane⁶, which does not meet our standard for green hydrogen⁷. Without a robust commitment to only green hydrogen projects, hydrogen deployment in California threatens to exacerbate existing pollution for environmental justice communities.

We appreciate the opportunity to comment on the CEC’s proposed investment plan and show support for the proposed battery electric investments overall, but continue to have strong concerns with CEC’s proposed hydrogen investments.

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 Wu

Transportation Equity Program Manager

⁶ [2024–2025 Investment Plan Update for the Clean Transportation Program Commission Report](#)

⁷ [“Equity Principles for Hydrogen: Environmental Justice Position on Green Hydrogen in California”](#), Asian Pacific Environmental Network (APEN), California Environmental Justice Alliance (CEJA), Center for Community Action and Environmental Justice (CCA EJ), Center on Race, Poverty & The Environment (CPRE), Communities for a Better Environment, Environmental Health Coalition, Leadership Counsel for Justice and Accountability, Pacoima Beautiful, Physicians for Social Responsibility Los Angeles (PSR-LA) (October 2023)