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<b>Project Title:</b>	National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans
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*Comment Received From: Christopher Chavez, Coalition for Clean Air  
Submitted On: 6/28/2022  
Docket Number: 22-EVI-03*

**CaSTACaltransCEC Sub-Working Group on Transition to Zero-Emissions**

Please see attached.

*Additional submitted attachment is included below.*



June 28, 2022

California Energy Commission  
Docket Unit  
RE: Docket No. 22-EVI-03  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: Comments to CalSTA/Caltrans/CEC Sub-Working Group on Transition to Zero-Emissions**

Coalition for Clean Air supports the efforts of the California State Transportation Agency (CalSTA), the California Department of Transportation (Caltrans), and the California Energy Commission (CEC) to utilize the Federal funding made available under the National Electric Vehicle Infrastructure (NEVI) Program. We offer the following recommendations to ensure this funding is utilized effectively, equitably, and in those communities and locations where they can have the greatest impact in advancing electric vehicle (EV) adoption.

Since 1971, Coalition for Clean Air has worked to protect public health, improve air quality, and prevent climate change. Our work focuses on the transportation sector, which is the leading cause of air pollution in California. Over half of the state's greenhouse gas emissions and 80% of the state's smog-forming pollutants are from the transportation sector. California will not be able to meet its climate and air quality obligations without cleaning the transportation sector. Further, given that air pollution disproportionately impacts disadvantaged communities first and hardest, California must prioritize these communities for investments, both in terms of vehicles as well as support infrastructure.

As outlined in the Office of Management and Budget's Interim Implementation Guidance regarding the Justice40 Initiative,<sup>1</sup> the Biden Administration seeks to ensure that at least 40 percent of the benefits of Federal investments are directed to disadvantaged communities (DACs). We also note that the Council on Environmental Quality (CEQ) has released a beta version of the Climate and Economic Justice Screening Tool (CEJST)<sup>2</sup> to help map DACs and the U.S. Department of Transportation (DOT) has also released a beta version of its EV Charging Justice40 Map Tool,<sup>3</sup> which is meant to help grant applicants determine whether the locations of their proposed projects are in a DAC. Furthermore, the DOT and the U.S. Department of Energy have developed an interim joint definition of DACs for the NEVI Formula Program.<sup>4</sup> While we appreciate these efforts, additional work is necessary to ensure coordination across state and Federal entities to ensure that sufficient investment is being directed to DACs.

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<sup>1</sup> Office of Management and Budget, Interim Implementation Guidance for the Justice 40 Initiative.

<https://www.whitehouse.gov/wp-content/uploads/2021/07/M-21-28.pdf>

<sup>2</sup> White House Council on Environmental Quality, CEQ Publishes Draft Climate and Economic Justice Screening Tool, Key Component in the Implementation of President Biden's Justice40 Initiative.

<https://www.whitehouse.gov/ceq/news-updates/2022/02/18/ceq-publishes-draft-climate-and-economic-justice-screening-tool-key-component-in-the-implementation-of-president-bidens-justice40-initiative/>

<sup>3</sup> Argonne National Laboratory, Electric Vehicle Charging Considerations.

<https://www.anl.gov/es/electric-vehicle-charging-equity-considerations>

<sup>4</sup> Ibid.

To achieve the goals of the Justice40 Initiative and align these with existing equity efforts in California, Coalition for Clean Air stresses the need for robust, analytical tools that take into consideration regional and local needs and priorities to inform California's implementation of the NEVI Program. These tools should reliably forecast EV demand and optimize the identification and siting of EV charging stations. These sites should be identified at high levels of granularity, ideally up to one-third of a square mile, and should be ranked based on key parameters, including the area median income, the number of affordable multifamily housing units, and the level of existing chargers. After program data has been obtained, data should be aggregated and analyzed to inform future decision-making.

We recommend that CalSTA/Caltrans/CEC utilize the Caret® EV infrastructure planning tool (Caret EVi Planner) developed by the Center for Sustainable Energy (CSE). This tool has the functionalities necessary to facilitate EV infrastructure planning, optimize EV infrastructure siting, and achieve the equity goals outlined under the Justice40 Initiative. Furthermore, the Caret EVi Planner also includes data indicators from CalEnviroScreen, which is a robust mapping tool that reflects the lived realities of DACs in the state because it has been developed with considerable feedback from equity and environmental justice stakeholders. The Caret EVi Planner brings powerful, neutral analytics to the task of managing the EV charger infrastructure investment to advance the Justice40 goals articulated in the IJIA and California's equity goals.

We appreciate the opportunity to provide these comments and is excited to continue engaging with CalSTA, Caltrans, and the CEC in the implementation of the NEVI Program.

Sincerely,

A handwritten signature in black ink that reads "Christopher Chavez". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Christopher Chavez  
Deputy Policy Director