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GREENLINING.ORG

October 26, 2018

Clerk of the Board
State of California, Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

Re: Electrify America's Cycle 2 ZEV Investment Plan

Members of the California Air Resources Board:

We appreciate Electrify America's (EA) progress on social equity in its Cycle 2 plan relative to its Cycle 1 plan. We write to express support for this progress and direction in the Cycle 2 plan. We withhold full support because we still see areas for improvement and missed opportunities for maximizing social equity outcomes.

In an April 20, 2018 letter we (along with partners and allies) made recommendations to EA on its Cycle 2 investment using the following framework:[1]

- Prioritize investment in low-income and disadvantaged communities
- Ensure, direct, assured, targeted benefits for low-income and disadvantaged communities
- Maximize societal good by promoting economic equity
- Promote community engagement and power

Based on that framework, we appreciate and acknowledge many aspects of the Cycle 2 plan:

- EA will strive to ensure 35% of investments in California are in low-income or disadvantaged communities and use these communities as one criterion for site selection.
- Specific investment in rural charging with a focus on healthcare and education institutions.
- Investment in charger incentive simplification tool and coordination with the One-Stop-Shop CARB transportation equity project.
- Investment in a no-money down residential L2 project.
- Investment in bus and shuttle charging.
- Investment in the Riverside-San Bernardino, Santa Cruz-Watsonville, and Fresno metro areas.

[1] See, http://greenlining.org/press/2018/comments-on-vw-settlements-zero-emission-vehicle-investment/

- Investment in marketing, education, and outreach strategies that are tailored to and target low-income and disadvantaged communities and leverage community-based organizations.
- EA is continuing to improve on maximizing economic equity outcomes by taking steps to (1) increase procurement of goods and services from minority- and women-owned businesses; (2) understand job creation impacts in disadvantaged and low-income communities through vendor surveys; and (3) enhance internal diversity and inclusion through various actions.

While the Cycle 2 plan makes progress on social equity, we find missed opportunities to deliver direct, assured, social equity outcomes and find areas for improvement:

- The plan can be improved by striving to ensure that *more than* 35% of investments are in low-income or disadvantaged communities, especially in low-income and disadvantaged communities that have lacked clean transportation investment. For example, explicit commitment to invest in the east to west highway corridors in the Central Valley.
- The plan and methodology can improve by adding more weight to the disadvantaged and low-income communities site selection criteria.
- The plan missed an opportunity in committing a Green City Initiative investment in the San Joaquin or Coachella Valley to bring transformative benefits to one of the poorest regions in the country, as recommended by Greenlining and many of our partners.
- While the plan makes an investment in a "No-money Down Residential L2 project" to reduce cost barriers, we have concerns that based on restrictions outlined in footnote 18, this investment will not be accessible to many low- and moderate-income households. The plan can improve by making investments that will reduce cost and access barriers in a real way such as more rural charging, low-income vanpool projects, complementary charging infrastructure investment for CARB's light-duty equity pilots (Clean Cars 4 All, CVAP), or other community-driven mobility equity investments (as outlined in our comments and in the SB 350 Low-Income Barriers to Clean Transportation Study).[2]
- The plan can be improved by using the $2-4M autonomous vehicle (AV) investment for more equitable purposes like ones mentioned in the previous bullet. AV's are already receiving substantial investment with one report estimating $80B in funding.[3]
- While we support and understand there is a role of shared mobility in our transportation system, we do not support the Metro Community Charging investment being specifically designed to support TNCs (i.e. Uber and Lyft). TNCs have market value and appeal to leverage their own resources to ensure their drivers are driving clean.[4] Moreover, a growing body of research shows TNCs hurt public transit, encourage sprawl, provide bad jobs, and we've seen racial discrimination in service. If these impacts are not addressed, TNCs can worsen inequality. Thus, TNCs should leverage their own resources if they

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[2] See, http://greenlining.org/wp-content/uploads/2018/08/Comments_EA-ZEV-Investment-Plan_Cycle-2.pdf
[3] See, https://www.brookings.edu/research/gauging-investment-in-self-driving-cars/
[4] "Proposals from Wall Street banks have valued a potential Uber initial public offering (IPO) at $120 billion, according to a report from The Wall Street Journal;" see, https://www.smartcitiesdive.com/news/banks-value-uber-at-120b-ahead-of-possible-ipo/539869/

want to electrify their services and EA's ZEV investment should not be "specifically designed" to support TNCs.

- The plan could have been improved by making specific disadvantaged and low-income communities commitments for the bus and shuttle charging investment, especially given the air quality/environmental justice benefits of targeting zero-emission technologies in unjustly polluted communities.
- Overall, the plan could be improved by making investments that reduce barriers for *low-income individuals* to access clean mobility options (as recommended above). While targeting investments in low-income and disadvantaged communities is a best practice to ensuring infrastructure is physically located in our poorest and most polluted communities, many other barriers might remain to ensure that the beneficiaries of those infrastructure investments are low- and moderate-income people.

EA's ZEV investment in California is rooted in VW's wrong doing, and low-income people of color were hit first and worst. Therefore, EA's ZEV investments must help remedy these harms and maximize benefits in these impacted communities. We greatly appreciate EA and its representatives in proactively reaching out and getting stakeholder input. We encourage EA to build off of these lessons and continue to incorporate and implement social equity best practices in implementation of Cycle 2.

Sincerely,

Joel Espino
Environmental Equity Legal Counsel
The Greenlining Institute