



August 1, 2025

Governor Gavin Newsom

Office of the Governor
1021 O Street, Suite 9000
Sacramento, CA 95814

Dr. Michelle Buffington

Division Chief for Mobile Sources
California Air Resources Board
1001 J Street
Sacramento, CA 95814

Re: Charge Ahead California Campaign Response to Executive Order (N-27-25) – ZEV Forward Proposals for Consideration

Dear Governor Newsom and Dr. Buffington,

California must meet the moment by continuing to champion strong policies for clean transportation and the climate, while centering equity and ensuring that the most pollution-burdened Californians are not left behind. In response to Executive Order N-27-25, the undersigned organizations comprising the Charge Ahead California Campaign submit the following recommendations on which all of our organizations are aligned to equitably advance the ZEV transition in California.

1. Coordinate and target vehicle incentives and charging infrastructure investments towards priority populations and disadvantaged communities.

Low income households and communities of color in California continue to fall behind in ZEV adoption rates¹ and charging access² while continuing to bear the brunt of pollution impacts.

¹ Yu, Q., He, B.Y., Ma, J. et al. California's zero-emission vehicle adoption brings air quality benefits yet equity gaps persist. Nat Commun 14, 7798 (2023). <https://doi.org/10.1038/s41467-023-43309-9>

² Chih-Wei Hsu, Kevin Fingerma, Public electric vehicle charger access disparities across race and income in California. Transport Policy, Volume 100 (2021). <https://doi.org/10.1016/j.tranpol.2020.10.003>.

California should use its limited public dollars towards closing these equity gaps that the market is failing to fill. Vehicle incentive programs such as Clean Cars for All (CC4A) and the Driving Clean Assistance Program (DCAP) should be funded to continue supporting ZEV access for lower-income households.

Lacking charging access poses a significant barrier towards ZEV adoption, particularly for groups including renters and apartment dwellers. As such, CARB's vehicle incentive programs should be coordinated with CEC's charging infrastructure investments and CPUC's energy ratepayer policies. In coordinating efforts, California can maximize the impact of our public dollars.

2. Redirect existing transportation funding for VMT- and pollution-increasing projects to invest in ZEVs and charging infrastructure.

California should use its authority to flex Federal-Aid Highway Program funding to support mobility, active transportation, and ZEV infrastructure projects. Funding for the Trade Corridor Enhancement Program (TCEP) should also be used to prioritize emissions-reducing electrification and charging projects, not highway expansion projects which increase VMT and pollution, disproportionately impacting disadvantaged neighborhoods bordering freight corridors.

3. Work with automakers to increase affordable ZEV options for passenger vehicles and fleets.

In the U.S., consumers lack access to a truly affordable zero emissions vehicle, in part due to automakers' decision to focus on luxury and high-end models. California can negotiate with automakers to secure bulk purchase agreements that make ZEVs available at a reduced cost for audiences such as public and private fleets and consumers participating in CC4A and DCAP (a specific Environmental Justice provision within Advanced Clean Cars II). Moreover, the state should encourage automakers to expand the availability of lower-cost ZEVs in California and increase access for drivers who are currently priced out of the zero emissions market.

4. Expand regulations on pollution sources and invest any fees levied into advancing ZEVs and ZEV infrastructure.

While E.O. N-27-25 focuses on advancing ZEV adoption as a dominant strategy to reduce greenhouse gas emissions, complementary policies are necessary to ensure California is on track for our climate goals. California agencies should explore and implement regulatory tools to reduce transportation-related pollution, including:

- a. Indirect Source Rules
- b. Retiring diesel trucks older than 18 years or with over 800,000 miles
- c. Tire efficiency standards

Elaboration on these regulatory tools can be found in our organizations' individual letters.

5. Center equity and community as a principle in all policies and stakeholder processes.

Not only should investments and policies coming out of this ZEV Forward process prioritize disadvantaged communities most burdened by pollution, they should also be centered within

stakeholder processes. The Governor's Office, CARB, CEC, and other agencies must ensure robust outreach, multimodal and multilingual engagement opportunities, and sufficient timelines for frontline communities to give feedback on policies and projects impacting them.

We appreciate the opportunity to share recommendations on actions California can take to continue making progress towards a future with clean transportation and clean air for all. Please do not hesitate to reach out with any questions or for further discussion.

Sincerely,



Mars Wu
The Greenlining Institute



Bahram Fazeli
Communities for a Better Environment



Carter Rubin
Natural Resources Defense Council



Laura Deehan
Environment California



Chris Chavez
Coalition for Clean Air