



August 8, 2023

Taylor Marvin
California Energy Commission
715 P Street
Sacramento, CA 95814
Docket 23-TRAN-02

RE: Comments on Electric Vehicle Infrastructure Project Tracker

Dear Mr. Marvin:

We appreciate the California Energy Commission's (CEC) work to develop the Electric Vehicle (EV) Infrastructure Project Tracker to analyze and overcome barriers to the deployment of zero-emission vehicle infrastructure in the state. This database of CEC-funded (and non-CEC projects) will support progress in the transition to zero-emission vehicles (ZEV) that is central to meeting clean air and climate goals.

Transportation is the largest source of emissions in the United States. Our 2023 "[State of the Air](#)" report found that California is home to six of the top ten cities with the worst ozone in the nation, and eight of the ten most impacted by particle pollution. Unhealthy air can cause various respiratory and cardiovascular illnesses, such as asthma attacks, heart attacks, strokes, and premature death. Californians need zero-emission technologies to reduce pollution and improve public health while also addressing the climate crisis. In addition, communities living near ports, warehouses, and major truck routes are disproportionately burdened by the impacts of combustion engines.

In recent years, the California Air Resources Board (CARB) has adopted new regulations to transition all new passenger vehicles by 2035 and all new medium- and heavy-duty vehicles to zero-emissions by 2036. This transition to ZEV could result in \$169 billion in health benefits from 2020 to 2050 in California and over 15,000 lives saved according to our "[Zeroing in on Healthy Air](#)" research. To ensure the transition to ZEVs, it is critical for the Energy Commission to ensure EV charging infrastructure is available throughout the state to meet the goals outline by CARB ZEV regulations.

We look forward to this tool providing transparency to the public on the completion and development of EV charging infrastructure, location gaps, project funding requirements, and timelines. We appreciate staff consideration of comments raised at the July 18th workshop, including the potential for additional data tracking related to project power capacity needs, inclusion of renewable energy, equitable distribution of infrastructure among others. The analysis of the EV Infrastructure Project Tracker should include whether California is on the path to meet needed infrastructure to support California's ZEV standards, identifying ways to build charging infrastructure faster, address project barriers and identify delays to energizing/activation of project sites. Also, to ensure the equitable deployment of ZEVs and charging infrastructure, CEC should analyze the distribution of projects throughout regions of the state to ensure projects are meeting and exceeding CEC's goals of providing benefit to low-income and disadvantaged communities most impacted by transportation-related pollution. Lastly, we encourage



CEC to ensure all analysis generated is ultimately relayed in a timely manner to the Public Utility Commission to inform efforts to address delays in charging infrastructure.

In closing, we look forward to the ongoing development of the tool to illustrate progress and identify challenges in deployment of the robust infrastructure needed to help California meet clean air and climate standards. Please contact Mariela Ruacho at Mariela.Ruacho@Lung.org for any additional information.

Sincerely,

Mariela Ruacho
Clean Air Advocacy Manager