

DOCKETED

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EV permitting and ADA in rural settings

Additional submitted attachment is included below.



September 16, 2019

MEMO

To: Brian Fauble
From: Dana Boudreau
Subject: EV permitting and ADA in rural settings

Dear Mr. Fauble, the Redwood Coast Energy Authority (RCEA) is pleased to provide insights on permitting challenges for electric vehicle charging stations (EVCS) in rural settings.

Feedback from readiness planning and implementation activities

During our work on the California Energy Commission grant ARV-14-046 and as documented in the final report, we observed the following:

- Regional “authority having jurisdiction” staff expressed hesitation about adopting alternative or new processes based on unfamiliarity with the mechanics of electric vehicle charging stations (EVCS). One key point is the potential to affect the grid in potentially oversubscribed areas.
- Lack of municipal staffing capacity and/or interest in EVCS continues to be a barrier.
- Smaller jurisdictions often elect to contract with planning firms, who need to be included in education and outreach.
- With staffing constraints, small jurisdictions feel the combined pressure of new accessibility and streamlining requirements, and limited parking inventory. Although EV charging and parking are considered separate land use cases, site hosts and local officials perceive that they compete for the same scarce pavement footprint.
- California local governments observed a 9% reduction in intergovernmental revenues when comparing the FY 2007-2009 average to FY 2014¹. Although this roughly equals about 1% of total local funds, spending must first address essential services in lean times, and new or optional initiatives must wait for future discretionary or designated funds. As EV charging benefits a small subset of the population, it is a lower priority.

Practical experiences from operating a not-for-profit network

As RCEA continues to operate an EVCS network, here are a few more points to consider:

- Older EV charging stations installed before current ADA code will likely experience attrition when costs are triggered beyond basic hardware upgrades. Stations with marginal economic value are particularly vulnerable, and these are often in less affluent locations or are sites in outlying areas that help to address range anxiety.
- EVCS infrastructure is still a new concept and remains unfamiliar to municipal staff and site hosts. Where training has occurred, staff turn-over can quickly erode institutional knowledge in small communities where cross-training is limited.

¹ <https://www.governing.com/gov-data/finance/local-government-intergovernmental-revenues-from-states.html>

- Our region has dated infrastructure, including roads and parking, building design and condition, and electric utilities. With limited new construction, most potential EVCS site locations in our region typically must address deferred maintenance and limited capital resources. One way to address this is to better target site opportunities through better access to data. A tool similar to PG&E’s PVRAM tool² for local solar projects would be useful to identify potential grid congestion before engaging with potential site hosts.
- Various planning associations³ are proposing foresight on near-term parking and roadway infrastructure projects, so that local authorities can assess potential consequences of emerging technologies such as the sharing economy and autonomous vehicles.

Evaluate grant design to better serve people with disabilities

CalEnviroScreen is one example of how state agencies currently improve equity for disadvantaged communities with environmental degradation. Similarly, county-level data can be used to design state EVCS funding models so that communities with the highest ADA populations receive a proportionate share of funds. The National Institute on Disability, Independent Living, and Rehabilitation Research⁴ provides county-level disability statistics; see the table below for a partial sample for 2015, with an emphasis on Northwest California.

Table 1: Prevalence of People with Disabilities for California, by County: 2015

County	Total population	Disability count	Disability %
Del Norte	24,021	5,400	22.5
Humboldt	133,962	22,426	16.7
Mendocino	86,622	14,632	16.9
Glenn	27,732	4,769	17.2
Lake	63,470	13,465	21.2
Santa Clara	1,859,170	144,096	7.8
Fresno	945,353	117,014	12.4
Los Angeles	9,968,960	967,572	9.7

Using California Clean Vehicle Rebate Project statistics⁵ as a proxy for ZEV funding distribution, we observe that urban and southern populations have best capitalized on current rebate structures. There are numerous factors that affect early regional penetration of ZEVs, such as cost, range and available vehicle models, but the outcome is that ZEV funding would benefit from more work to reach communities with high disability prevalence.

² Pacific Gas and Electric Company, Solar Photovoltaic and Renewable Auction Mechanism (PVRAM) map; https://www.pge.com/en_US/for-our-business-partners/distribution-resource-planning/distribution-resource-planning-data-portal.page

³ The American Planning Association provides a website with over forty references on autonomous vehicles and the potential impact to city and regional planning and design; <https://www.planning.org/knowledgebase/autonomousvehicles/>

⁴ Annual Disability Statistics Compendium, “2015 California Report for County-level Data: Prevalence”; <https://disabilitycompendium.org/compendium/overall-prevalence-report/CA>

⁵ California Clean Vehicle Rebate Project, CVRP Rebate Map by County; <https://cleanvehiclerebate.org/eng/cvrp-rebate-map>

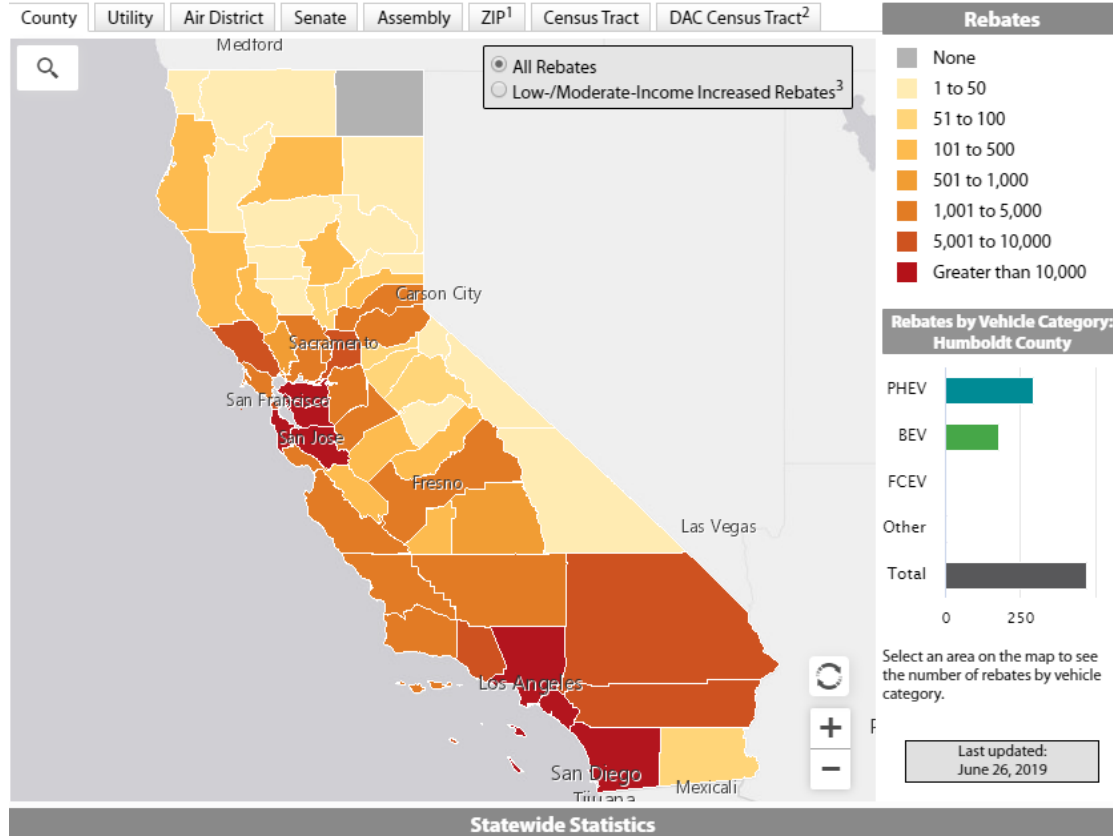


Figure 1: California Clean Vehicle Rebate Map, by County, June 2019

Assess correlation between disabilities and poverty

Another consideration is to evaluate the relation between disability and poverty. According to the Center for Poverty Research⁶, in 2014 the U.S. had a 15% overall poverty rate, but those with a disability observed a 29% poverty rate. Combining ADA population and poverty statistics can highlight equity considerations and inform funding strategies that reduce gaps arising from free-market principles.

An August 2019 Humboldt County report⁷ indicates that 70% of people can't afford median-priced houses in Humboldt County. By correlation, people with disabilities will have a higher need for public, multi-family, and workplace charging given their limited opportunity to use a home charging station.

Again, thank you for the opportunity to provide feedback on this topic, and the Redwood Coast Energy Authority looks forward to ongoing efforts to promote equitable EVCS infrastructure in California.

Dana Boudreau
Director of Operations

⁶ Center for Poverty Research, University of California, Davis, "How is poverty status related to disability?"; <https://poverty.ucdavis.edu/faq/how-poverty-status-related-disability>

⁷ Times Standard, "Housing report: 70% of unincorporated Humboldt County residents can't afford median-priced houses"; <https://www.times-standard.com/2019/08/20/housing-report-70-of-unincorporated-humboldt-county-residents-cant-afford-median-priced-houses/>