

DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	241036
Document Title:	San Francisco Bay Area Rapid Transit District Comments - CA CEC LD EV Charging
Description:	N/A
Filer:	System
Organization:	San Francisco Bay Area Rapid Transit District
Submitter Role:	Public Agency
Submission Date:	12/21/2021 1:21:44 PM
Docketed Date:	12/21/2021

*Comment Received From: San Francisco Bay Area Rapid Transit District
Submitted On: 12/21/2021
Docket Number: 20-TRAN-04*

CA CEC LD EV Charging - BART Comments 2021-12-15

Please see attached comments. Thank you!

Additional submitted attachment is included below.



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
2150 Webster Street
Oakland, CA 94604-2688
(510) 464-6000

2021

December 15, 2021

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RE: Docket No. 20-TRAN-04

Comments for California Energy Commission's (CEC) Electric Vehicle Infrastructure Project Funding for Light-Duty EVs

Dear California Energy Commission Staff,

Thank you for the opportunity to provide comments on Light Duty EV Infrastructure funding. The San Francisco Bay Area Rapid Transit District (BART) supports CEC's Clean Transportation Program's goal "to develop and deploy innovative technologies that transform California's fuel and vehicle types to help attain the state's climate change policies."

These programs support the goals laid out in BART's Board-approved [Electric Vehicle Charging Policy](#). These policy goals are for:

- Greener and Healthier Communities,
- Equitable Access, and
- Intelligent and Scalable Operations.

BART provides regional transit service, connecting five counties, and four of the Bay Area's largest cities (San Jose, San Francisco, Oakland, and Fremont) on 135 miles of track with 50 stations. Pre-pandemic ridership was over 410,000 weekday passengers. Multiple transit agencies also connect to BART. BART has 35 stations with over 47,000 customer parking spaces. The vast majority of BART's passenger service is on electrified-rail, using 100% greenhouse gas free electricity in 2020.

BART is excited about the opportunity to provide EV charging at scale for two critical markets:

- 1) **Customer-Facing:** BART manages over 47,000 public parking at 35 rail stations. As part of a multi-modal trip, our primary mission is to provide safe and clean transit service as an alternative to auto driving. Therefore, during commute hours any EV charging would be prioritized for transit rider use, which typically can be for eight hours or more a day. During evening and weekends, EV charging could be available to the general public.
- 2) **BART Corporate Fleet:** As BART seeks to transition much of its fleet of light-duty vehicles, these vehicles will need to be charged at BART stations, yards, shops and other facilities.

We thank CEC staff for conducting its recent Public Workshop on Light-Duty Electric Vehicle Infrastructure Allocation and soliciting feedback from stakeholders. BART welcomes the opportunity to work with the CEC to increase accessible EV charging infrastructure. We compiled the following responses to questions posed in the workshop.

Local Government Fleet Charging

BART owns over 340 light-duty fleet vehicles, including 125 police fleet vehicles. BART keeps non-police vehicles at one of six BART shops and yards or in a privately-owned parking garage near BART headquarters in downtown Oakland.

Question 1: Restricted fleet charging or include public charging?

BART can accommodate either option, depending on the subset of the fleet. For security purposes, BART shops and yards are not open to the public. BART must restrict chargers located in shops and yards to only fleet charging. BART has one fleet parking location that is in a privately-owned, garage that is open to the public. Chargers for fleet vehicles at the privately-owned garage could be open to the public but require coordination with the garage owner.

BART operates its own police force. There is more nuance for BART police vehicle charging. Police patrol vehicles are constantly used and would require DC Fast Charging (DCFC) at BART stations. BART parks other police vehicles overnight at one of a dozen BART stations where there is a police sub-station office. Both vehicles could share a charger with the public but would require prioritization, especially for the DCFC. If a police patrol vehicle requires a charge and there is a wait for a DCFC, they would need to jump the line.

Question 4: Reward implemented streamlined permits for chargers?

As a special district, BART does not issue permits for charger installation. That said, BART would like to ensure that BART would be eligible for Fleet Charging grants and respectfully requests including language to clarify eligibility. Potential language could include: "If this government agency issues EV charging permits, this grant is only available to agencies who have implemented streamlined permits for charging."

High-Density Level 2 Charging

BART supports the inclusion of transportation hub projects under this program.

Question 1: Which project type is most visible to drivers?

BART has 50 stations that are highly visible multi-modal hubs located in five Bay Area Counties (Alameda, Contra Costa, San Francisco, San Mateo and Santa Clara Counties). For example, 17 public bus agencies and many more private shuttles stop at a BART station. Most BART stations have bike lockers and Bay Wheels shared bike docks within steps of the station entrance. BART stations are close to multifamily housing, workplaces, public destinations, retail locations, and many other services. When charging at transportation hubs, EV drivers can enjoy close-by amenities or use public transit to travel further. EV chargers installed at transit stations support equitable EV adoption.

In support of equitable access, BART parking facilities locations can support EV adoption for low-income and disadvantaged communities. BART has more than 47,000 parking spaces located at 35 different stations across the Bay Area. Over half of BART stations are classified as either high minority, low income, or both. Parking facilities at BART stations can host publicly accessible EV charging infrastructure. Due to their locations, these chargers would support equitable EV adoption.

Question 2: Which project gives drivers the most charging confidence?

In addition to equity access, transportation hubs are near multi-family housing, providing a dual charging opportunity. Downtown locations or parking garages in retail areas are less likely to have this duality. Commuters can charge during the day and nearby residents can charge on nights and weekends. There are over 16,000 multi-family housing units (including over 2,700 affordable housing units) within walking distance to a BART station. If nearby residents can charge their car at a BART station overnight, they can confidently purchase an EV and know where they can charge.

Question 4: What are the characteristics of the charging environment needed to shift drivers' attitude from uncertain about charging availability to confident about charging options?

To shift driver's attitudes about charging availability from uncertain to confident, charging must be installed at scale at transportation hubs. There needs to be ample EV charging, so people considering buying an EV see available charging spaces. BART piloted EV charging at two passenger stations, which proved interest from BART passengers and local EV drivers. One location has 4 plugs, the other, 42. Before the pandemic, the location with 4 plugs would fill up while the location with 42 still had chargers available. This larger volume of chargers establishes the confidence needed for BART passengers to purchase an EV. Additionally, in line with BART's Parking Programs, drivers will be able to reserve EV Charging parking spaces, further increasing confidence.

Ideal Funding Opportunity for EV Chargers at BART


To effectively implement an EV Charging program at BART, BART seeks a large, established pool of funding to draw down as BART installs EV charging at its transit stations. Since BART has 35 station locations with over 47,000

parking spaces, there is potential to install a substantial amount of EV charging. However, currently available funding opportunities are small and would require many grant applications. These opportunities would require BART to take a piecemeal approach. This is the main reason why BART has not historically participated in the CEC's California Electric Vehicle Infrastructure Project (CALeVIP). The reserved funding limits, which was under \$1M for the most recent Alameda County solicitation, is too low.

A large pool of funding also allows BART to create a consistent experience across BART stations, which is a unique need for BART. Cities can provide EV charging from multiple providers and drivers will find and use their preferred provider. With transit stations, riders expect the same amenity (e.g., EV charging station) regardless of which transit station they use that day. One large funding opportunity enables the opportunity to work with one technology provider to create a consistent amenity.

BART welcomes the opportunity to work with the CEC on these programs. Should you have any further questions regarding BART's comments, please do not hesitate to contact me or Monica Meagher, Sustainability Project Manager, at MMeaghe@bart.gov. Thank you for your consideration.

Sincerely,



Val Joseph Menotti
Chief Planning and Development Officer