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Los Angeles County Comments on the National Electric Vehicle Infrastructure (NEVI) Deployment Plan Development

Additional submitted attachment is included below.

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June 28, 2022

Drew Bohan, Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

Steven Keck, Acting Director
California Department of Transportation (Caltrans)
1120 N Street
Sacramento, CA 95814

RE: Comments on the National Electric Vehicle Infrastructure (NEVI) Deployment Plan Development, 2022-26 for CEC and Caltrans (22-EVI-03)

Dear Mr. Bohan and Mr. Keck,

On behalf of the Los Angeles County (County), we thank you for the opportunity to submit comments on the proposed National Electric Vehicle Infrastructure (NEVI) Deployment Plan (draft plan) Development process and assist in the effective and prudent allocation of $384 million in electric vehicle (EV) infrastructure funding. The Internal Services Department (ISD) plays a major role in supporting all County departments and commissions. ISD's Office of Energy and Environmental Services (EES) is positioned to operate one of the nation's largest network of municipally-owned electric vehicle supply equipment (EVSE). Since 2015, the County has installed nearly eight hundred (800) EV Level 2 and Direct Current fast charging (DCFC) ports at eighty (80) County facilities and an additional 1200 ports across 100 sites are under development to support the electrification of County fleets and provide vehicle charging to employees as well as the public. The extensive reach of our planned network provides the County an important opportunity to develop infrastructure at facilities in disadvantaged communities near multi-unit dwellings, which are often in communities that have been disproportionately burdened by environmental pollution and historically underserved.

The County has the largest population of any county in the nation with just over 10 million residents, accounting for approximately twenty-seven percent (27%) of California's population. The County is also home to more than fifty percent (50%) of the state's disadvantaged communities (DACs) at or exceeding the twenty-fifth percentile (25%) per CalEnviroScreen 4.0. Those communities especially impacted by pollution surround the ports of Los Angeles and Long Beach (POLA and POLB). Together POLA and POLB are the largest ports in the nation, moving over twenty (20) million cargo containers in 2021 alone as well as being the single largest fixed source of air pollution in Southern California. Collectively, emission sources at the ports are responsible for more than 11,734 tons per year of smog- and particulate-forming nitrogen oxides. Previously, the California Air Resources Board (CARB) estimated that port air pollution creates cancer risks exceeding five hundred (500) cases per one (1) million residents exposed over a lifetime.

We respectfully submit the below comments indicating areas of improvement for the draft plan that we believe will maximize its impact:

1. **California should ensure that there is a balanced focus on light-duty EV charging as well as medium- and heavy-duty EV charging when administering NEVI funds.** We want to express concerns with an initial focus only on light-duty EV charging infrastructure and would encourage more dedicated funds for medium- and heavy-duty EV charging infrastructure from the beginning of the program. As indicated on page seven of the draft plan, Executive Order N-79-20 established California's zero-emission vehicle targets to reach 100% zero-emission medium- and heavy-duty vehicles in the state by 2045 where feasible and by 2035 for drayage trucks, and 100% zero-emission off-road vehicles and equipment operations by 2035, where feasible. These targets are equally as important as the zero-emission target to reach 100% of in-state sales of new passenger cars and light-duty trucks being zero-emission by 2035, however, the draft plan indicates dedicated focus of funds for medium- and heavy-duty charging would only occur if the light-duty focused alternative fuel corridors (AFCs) were fully built out to NEVI standards.
    - Like many municipalities throughout the state, the County has aggressive goals to shift towards zero emissions vehicles for our fleets as well as supporting community adoption. While we recognize the need for public charging infrastructure for light-duty EVs, we also want to call attention to the devastating impact on air quality that neglecting medium- and heavy-duty EV charging needs could have on the state, and the Southern California region in particular.

2. **The Plan for Electric Vehicle Infrastructure Deployment should be updated to include more detailed maps of AFCs throughout California and, if possible, provide a link to view an interactive map**. As currently presented in the draft plan, the major metropolitan areas across the state are undecipherable regarding number of public DCFCs and NEVI built-out corridors. The noninteractive nature of the maps and lack of detailed inserts falsely portray metropolitan areas as not needing additional EV charging infrastructure when, these areas most certainly do. While there is a pressing need for new infrastructure investments in regions that lack any infrastructure to meet the maximum distance between stations under NEVI guidelines, Geographic Information Systems layers that include population or vehicle registration density or traffic density could serve to inform where stations are needed based demand.

3. **California should develop buckets of funding based upon geographic region (e.g., Northern California, Central California, and Southern California).** California is a large state, and its different regions require differing levels of AFC build-out. Therefore, to ensure funds are distributed equitably across the state, we encourage an alternative, region-specific approach to funding allocations that will allow for fair distributions while not excluding lower-trafficked areas – balance is critical. Precedent exists for this system of allocating funds in the state as evidenced by the Charging Access for Reliable On-Demand Transportation Services (CARTS) solicitation administered by the California Energy Commission (CEC).
    - The metropolitan areas across the state experience the most traffic and likely the fastest adoption of EVs at scale on a number of vehicles basis, and therefore

demand a higher density of publicly accessible EV chargers. The NEVI built-out corridors definition of at least four (4) 150kW charging ports no more than fifty (50) miles from other equivalent stations does not represent a sufficient charging network for metropolitan areas across the state. These densely populated areas will not be able to develop a sufficient publicly accessible network of chargers to support their residents without Federal and state support. The question that should be asked is not just whether there is availability of charging infrastructure in an area, but whether there is sufficient availability relative to the demand.

- Additionally, not all AFCs are created equal. We suggest that funding should be allocated to those areas that have the greatest need for additional EV charging infrastructure based on the volume of vehicles in the region or traveling through the AFC. We understand and support the necessity of building out linkages across all AFCs in the state, however, there must be an equitable balance between developing capacity uniformly across AFCs compared to AFCs in densely populated metropolitan areas. For example, the County has many multi-unit dwellings (MUDs) where residents will likely rely upon publicly accessible charging DC Fast Charging for their EVs. Therefore, installing more EV chargers in metropolitan areas will better support the population.

4. **California should leverage the economic potential for attracting, retaining, and growing the EV charging infrastructure manufacturers in-state through preference for localized production.** To the extent possible and advantageous for our in-state manufacturers, we encourage the state to consider preference points assigned to applications indicating the installation of California-manufactured products. California has a unique opportunity to be an economic leader as well as an environmental leader through the distribution of these funds, and we encourage the state to maximize the benefits that can be realized.

5. **As a condition of receiving NEVI funds, awardees should be required to comply with the California Department of Food and Agriculture Division of Measurement Standards EVSE 2020 Reference Document, and any other applicable DCFC regulations from the time of installation for up to 10 years post-installation.** A more robust and expansive set of requirements can be set upon awardees securing funds. This will ensure prolonged uptime and reliability of the EV charging infrastructure as well as a positive user experience.

6. **California should consider creating a Workforce Improvement benefit category with associated metrics and including an additional Air Quality Improvement metric.** We suggest incorporating an Air Quality Improvement metric that measures direct benefits to individuals living in DACs (e.g., reduction in number of asthma-related emergency room visits). Metrics for the Workforce Improvement benefit could include the number of individuals trained through programs across the state, and the number of zero-emission vehicle-related jobs that are preserved and created.

7. **The California Energy Commission (CEC), California Department of Transportation (Caltrans), and the California State Transportation Agency (CalSTA) should support**

more meaningful community engagement prior to finalizing the draft plan. We hope that the CEC, Caltrans, and CalSTA will conduct outreach and solicit feedback from diverse communities across the state that will receive the direct benefits of these DCFC installations. Please do not hesitate to reach out to ISD to connect with relevant community groups in the Los Angeles County metropolitan area.

- The CEC, Caltrans, and CalSTA should gather input on existing workforce development programs and analyze any gaps in necessary workforce support to achieve the goals of the draft plan. This is especially important to advise on the workforce development needs for residents and businesses in DACs, as there will be a high demand for skilled workers and contractors to meet installation targets and maintain the EV charging infrastructure once it has been installed.

8. **California should consider waiving cost-share requirements for public agencies and allow for cost-share to be comprised of future Low Carbon Fuel Standard (LCFS) credit revenue and electricity costs.** Public agencies often have parcels that are near or adjacent to highway corridors (e.g., transit park and ride lots), but they may not have funds available for cost-share and lack the ability to quickly secure those funds. If cost-share requirements cannot be completely waived for public agencies, we recommend reducing the per project requirement to ten percent (10%).

We are supportive of the state's goals to use these funds to accelerate the deployment of EV charging infrastructure, and we are hopeful these impacts will be felt in the County of Los Angeles. Please do not hesitate to reach out to ISD's General Manager of Energy and Environmental Services, Minh Le, at MSLe@isd.lacounty.gov as you move throughout this process.

Thank you in advance for your consideration, and we look forward to continuing to engage with you throughout the plan's program development.

Sincerely,

Minh Le

Digitally signed by Minh Le
Date: 2022.06.28 14:31:58 -07'00'

MINH LE
General Manager
Energy & Environmental Service