

**DOCKETED**

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*Comment Received From: Transportation Agency for Monterey County  
Submitted On: 9/28/2022  
Docket Number: 22-EVI-05*

**TAMC Comments on CA NEVI Program Pre Solicitation Workshop**

*Additional submitted attachment is included below.*



California Energy Commission  
Attn: 22-EVI-05 NEVI  
Dockets Office  
1516 Ninth St  
Sacramento, CA 95814  
Via email to: [Docket@energy.ca.gov](mailto:Docket@energy.ca.gov)

**SUBJECT: National Electric Vehicle Infrastructure (NEVI) Funding Program**

Dear Commissioners:

On behalf of the Transportation Agency for Monterey County (TAMC), I am writing to comment on the National Electric Vehicle Infrastructure (NEVI) Funding Program, Docket 22-EVI-05 NEVI.

We believe that the proposed ranking formula should be reconsidered. As proposed, the formula gives a corridor up to 10 points if the corridor serves a Justice 40 (J40) community and another maximum 10 points if the corridor serves a disadvantaged community (DAC) and/or a low-income community (LIC), based on the EnviroScan 4.0. Overlaying those considerations with an additional 5 points if at least 50% of the corridor serves both a DAC/LIC and a J40 community is redundant, considering the amount of overlap among those criteria, resulting in a total possible of 25 points for these corridors. Given that the criteria of whether it is an interstate corridor gets only 25 points, the redundancy leads to an overweight of the disadvantaged community consideration. The result of these criteria is to prioritize electric vehicle charging stations in these communities, whether or not they are served by an interstate corridor.

We would like the reviewing team to give equal or more consideration to whether the corridors carry interstate traffic, considering the State and Federal emphasis on electrifying freight traffic fleets. Freight traffic does not appear to be considered in these criteria. The US 101 corridor through the Central Coast region is an essential corridor for freight movement, delivering \$6.5 billion worth of produce to market annually, including 80 percent of the nation's lettuces from the nation's number one vegetable producing region, the Salinas Valley. The key transportation network connections the US 101 Central Coast corridor provides via state highways make the corridor a principal economic generator for the State and Nation. The result

of the proposed ranking analysis puts this critical interstate corridor at the bottom of the ranking, at #18 out of 20 corridor groupings.

Our other comment pertains to the variable noting the number of 150 kilowatt, or greater, DC fast chargers needed along the corridor. The score differential between 40+ chargers (20 points) versus 20-39 chargers (10 points) seems out of proportion, when the previous amounts all rise at an incremental rate of 2 points per category of needed chargers.

We appreciate the opportunity to comment. Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Todd Muck". The signature is written in a cursive, flowing style.

Todd A. Muck  
Executive Director