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ECC Public Comment--CA Draft EV Infrastructure Deployment Plan

Additional submitted attachment is included below.



California DRAFT State Electric Vehicle Infrastructure Deployment Plan EMERALD CITIES COLLABORATIVE PUBLIC COMMENT

I. Introduction

Thank you for this opportunity to provide public comment on California's Draft State Electric Vehicle Infrastructure Deployment Plan (Deployment Plan). While Emerald Cities Collaborative (ECC) appreciates California's commitment to direct investments in rural areas, low-income communities, and communities identified as disadvantaged to ensure these communities benefit from the Federal National Electric Vehicle Infrastructure (NEVI) Formula Program, ECC would also strongly encourage California to include economic inclusion standards within your Deployment Plan. Building strong economic inclusion standards into California's implementation of its State Deployment Plan will ensure overburdened and underserved communities see the economic benefits of the NEVI Formula Program as well.

II. Economic Inclusion Standards

Within the NEVI Formula Program guidance, the Federal Highway Administration (FHWA) highlights how installing, operating, and maintaining the NEVI Formula Program's Electric Vehicle (EV) Infrastructure is an opportunity for States to grow and diversify their local workforce and encourages States to use economic, geographic, and other hiring practices to maximize job growth and economic benefits for local communities. While California's draft Deployment Plan highlights the various workforce supports and trainings that California will use to build a strong EV Supply Equipment (EVSE) workforce, in order to ensure rural, low-income, and disadvantaged workers are benefiting from the EVSE workforce expansion, California should also include strong labor and procurement standards in the Grant Funding Opportunity (GFO) that will be responsible for distributing State funding for installing, operating, and maintaining EV infrastructure along California's Alternative Fuel Corridors (AFC).

California's draft Deployment Plan indicates California is considering making EVSE Workforce Plans a requirement of the GFO. As California continues to develop the criteria and requirements for the GFO, ECC would strongly advocate for GFO applicants to be required to submit EVSE Workforce Plans. In addition to or detailed within EVSE Workforce Plans, ECC would also advocate that GFO applicants who commit to negotiating Community Workforce Agreements (CWA) with local community members (i.e. labor/union leaders, residents, and local government officials) be prioritized within the GFO as well.

CWAs are similar to Project Labor Agreements (PLA) in that they include labor and management provisions; however, CWAs go beyond the standard PLA language by including stronger hiring provisions and procurement standards that are designed to benefit local community members. By including targeted hiring provisions that specify the percentage of work hours for local residents or disadvantaged workers (i.e. low-income or government benefits recipients), CWAs can ensure that rural, low-income, and disadvantaged community members are realizing the benefits of EVSE workforce and wealth building opportunities within their communities.

In addition to targeted hiring provisions, CWAs include local procurement standards for Minority and Disadvantaged owned business enterprises (MDBE). These provisions not only create opportunities to diversify the contractors and subcontractors working within EVSE projects, but also create additional wealth building opportunities for community members. Further, to ensure that parties are complying with the CWA provisions, CWAs include compliance monitoring provisions and sanctions for noncompliance.

CWAs also engage community voice in the CWA development process and incorporate community named benefits into the final CWA. Within the NEVI Formula Program guidance, the FHWA emphasizes the importance of embedding equity throughout the State EV Infrastructure Deployment Plan development and implementation process. By requiring CWAs in the GFO process, California can ensure that GFO recipients are working with local community members to ensure EV infrastructure is being implemented in an efficient and equitable manner.

Requiring the use of CWAs will ensure that the communities where EVSE projects are installed, operated, and maintained, especially the communities identified as disadvantaged, will realize the benefits of EVSE workforce opportunities in addition to the environmental benefits of improved air quality and greenhouse gas reduction.

III. Conclusion

Again, thank you for this opportunity to provide public comments for California's draft Deployment Plan and would welcome the opportunity to have further discussions on our comments and recommendations.