DOCKETED	
Docket Number:	22-EVI-03
Project Title:	National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans
TN #:	243948
Document Title:	Xiomara Chavez Comments regarding National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26
Description:	N/A
Filer:	System
Organization:	Xiomara Chavez
Submitter Role:	Public
Submission Date:	7/7/2022 6:56:26 PM
Docketed Date:	7/7/2022

Comment Received From: Xiomara Chavez
Submitted On: 7/7/2022
Docket Number: 22-EVI-03

Comments regarding National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26

Additional submitted attachment is included below.

Elissa Konove, Undersecretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

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

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

Re: 22-EVI-03 National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans

These comments are informed by the authors' clean mobility and environmental justice work, especially work done within California. Authors Xiomara Chavez and Brett Zeuner are currently employed by the Foundation for California Community Colleges (FoundationCCC) as Senior Program Specialist and Program Manager, respectively.

As clean mobility practitioners, we appreciate the opportunity to comment on the NEVI Deployment Plan Development that will help the State transition to ZEV by building the necessary infrastructure in a timely and equitable manner. We applaud the requirement to direct 50% of project funding to communities who have been disproportionately impacted by environmental injustices. Additionally, we commend the team for considering the community colleges in its workforce development efforts and look forward to seeing that the students we serve have access to a fulfilling career pathway to help the State transition and provide job security with livable wages.

We truly believe that our current actions have ripple effects and hope to see the most positive impact for all. It would be greatly appreciated that our recommendations below are considered in the development process.

Recommendation 1: Direct funding for Medium-Duty and Heavy-Duty charging infrastructure

The Draft Deployment Plan explains that a majority of this funding will be for Light Duty Charging Infrastructure, while useful, the greatest exposures to the most harmful of emissions come from MDHD vehicles that travel through our most impacted communities. Working on expanding infrastructure in tandem with light duty vehicles will help speed up the emissions reductions we are seeking. Additionally, we urge that more funding is invested in MDHD charging that can be utilized for public transportation. Importantly, this would have a greater

benefit for LICs and DACs who experience disproportionate barriers to personal vehicle ownership. Access to transportation options is important for all communities regardless of population density. The draft deployment plan claims that it sees only a one percent increase in Public Transit Services with no substantial evidence, even though these services are urgently needed.

Recommendation 2: Make specific requirements for long term maintenance and upkeep of chargers

We urge the NEVI deployment team to make stricter requirements for the maintenance of charging stations based on a few different criteria. For Networked DCFC, we urge that networks be required to be transparent and truthful of DCFC charger maintenance, that when a charger is reported for maintenance, the network company takes no more than 4 weeks to restore service.

For non-networked chargers and level 2 chargers, we would recommend more flexibility but demonstrate in the RFP process that they will have plans to keep these stations public and fully functional. This type of requirement will need oversight and we hope that this is accounted for during the NEVI time frame. Having this type of oversight will help adoption because drivers will have better security in knowing that the chargers that they need are available. Furthermore, in the event that the chargers are not available there should be a transparent timeline as to when service will be restored. Additionally, it should be encouraged that charging stations owners and operators use third party service providers to help maintain chargers when they are unable to do upkeep and maintenance themselves.

Lastly, the definition of a “working” charger should be that all of the ports and connectors of the station be fully functional and should dispense the correct amount of energy for each vehicle to make charging efficient with few interruptions during the session. We urge the NEVI deployment team to prioritize the perspective of EV drivers when defining highly impactful terminology.

Recommendation 3: Support the use of Battery Storage and Solar Technology for stations where the power grid needs development.

We recommend that NEVI supports the use of Solar Technology and Battery Storage to provide more clean fuel sources all while continuing to support areas where the grid needs support, especially in rural areas. Furthermore, excess power can be used in those same communities during emergencies or sold back to the local utility to meet local energy demands.

Recommendation 4: Stabilize charging fees and costs for all chargers across the State

We urge the NEVI team to create requirements for fee and kwh costing to be transparent, consistent, and stable for all chargers, regardless of network status. Further, chargers should not receive state funding if their costs would result in charging fees that are higher than gasoline equivalents. Currently, the cost of charging can vary greatly by network and, at times, the cost of DCFC charging can be more expensive than the equivalent premium gasoline fuel. While these occurrences are rare, there have been anti-EV opinion pieces and other media calling attention to the issue. Regardless of its frequency, any situation where DCFC is more expensive than

gasoline only serves to harm the State's ZEV adoption goals. Making charging costs affordable and accessible is fundamental to the adoption of all types of ZEVs for all those who want them.

Recommendation 5: Ensuring safety for marginalized people at charging sites
The adoption of electric vehicles for people without access to home chargers will rely on access to public chargers. While there has always been a risk of crime at gas stations, having to stay put in one place for a long period of time can increase one's risk of being a victim of crime. This is especially true for people with disabilities and people with marginalized identities who may be targeted more frequently. We urge that stations take into consideration the safety of their users by consulting with people who represent marginalized identities, including people with disabilities, people of color, LGBTQ+ people, and women.

This may include locating chargers in well lit areas with high visibility and close proximity to other amenities. Research on effective measures for risk reduction should inform charger siting and design. We do not encourage policing or armed security, but we do recommend the importance of community engagement and listening to the needs of those most impacted.

Recommendation 6: Include the voices of marginalized communities in the planning process that takes into account race, gender, disability etc.

We urge that in the outreach stage of the NEVI plan, the feedback of marginalized communities is prioritized, especially in the design, scope and implementation of the sites, to ensure that they are the most accessible to those who experience the greatest barriers to their usage. By prioritizing the needs of those who experience the greatest barriers, access is improved and overall usage is increased. This should be one of the main goals of NEVI investments. Prioritizing the needs of people who are marginalized and over-burdened means considering a multitude of factors, often in combination, such as ADA compliance, the physical space surrounding a charger, sidewalks, curb-cuts, wheelchair impediments (like gravel), lighting, and access to local businesses.

Xiomara Chavez is a clean mobility and transportation justice advocate with more than half a decade of professional experience with various organizations that focus on clean mobility and equity. She is very passionate about this work and works diligently to ensure that everyone is included in the State of California's transition to Zero Emission Vehicles.

Brett is currently Program Manager for the FoundationCCC's Environmental Equity program and oversees a portfolio of several transportation equity projects, including the IDEAL Communities project with the CEC. Brett holds a Master of Science with a concentration on environmental justice from the University of Michigan's School for Environment and Sustainability. Prior to coming to the Foundation, Brett worked on the Access Clean California project, a statewide initiative to reduce barriers to clean mobility options for California's most underserved residents. Brett has also advised the State of Michigan and the Biden Administration on the development of a state-specific, and a national, environmental justice screening tool, respectively.