



401 B Street, Suite 800  
San Diego, CA 92101-4231  
(619) 699-1900  
Fax (619) 699-1905  
sandag.org

October 26, 2018

File Number 7300400

Mr. Mark Williams  
California Air Resources Board  
Mail Stop 3E  
P.O. Box 2815  
Sacramento, CA 95812

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
- Del Mar
- El Cajon
- Encinitas
- Escondido
- Imperial Beach
- La Mesa
- Lemon Grove
- National City
- Oceanside
- Poway
- San Diego
- San Marcos
- Santee
- Solana Beach
- Vista
- and
- County of San Diego

ADVISORY MEMBERS

- Imperial County
- California Department of Transportation
- Metropolitan Transit System
- North County Transit District
- United States Department of Defense
- Port of San Diego
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

Dear Mr. Williams:

**Subject:** Electrify America's Proposed Cycle 2 Zero-Emission Vehicle Investment Plan

The San Diego Association of Governments (SANDAG) appreciates the opportunity to provide comments to the California Air Resources Board (CARB) on Electrify America's proposed Cycle 2 Zero-Emission Vehicle Investment Plan.

As the metropolitan planning organization for the San Diego region, SANDAG has a long history of working closely with local jurisdictions and stakeholders to reduce greenhouse gas emissions in support of statewide and regional goals through sustainable transportation projects, programs, and services. [San Diego Forward: The Regional Plan](#) includes a \$30 million investment to develop an incentive program for public electric vehicle (EV) chargers by 2020. The proposed investments by Electrify America could help maximize SANDAG efforts to build out a network of publicly accessible [EV charging infrastructure](#) throughout the region.

SANDAG believes that Electrify America's fast-charging investments will be complementary to planned regional investment in Level 2 workplace and public charging by SANDAG and the San Diego County Air Pollution Control District. The regional incentive program will focus resources on charging for vehicles planned to be parked for longer periods of time, whether at work, transit stations, shopping malls, etc. Together, these and other investments should create a robust EV charging network to meet the growing demand for EVs.

With this in mind, SANDAG would like to comment on the following components of the proposed Cycle 2 Investment Plan.

**Metro Community Charging**

SANDAG supports the ongoing inclusion of San Diego County (the San Diego–Carlsbad metro region) as one of nine metropolitan areas within California selected for metro community charging investments in Cycle 2 and is pleased to see large investments being made by Electrify America and others to expand fast-charging infrastructure, which has high installation and operation costs.

However, SANDAG is concerned by Electrify America’s statement that it may decide to shift investments out of the San Diego–Carlsbad metro region in Cycle 2 if San Diego Gas & Electric (SDG&E) rates are not revised. We ask that CARB remove this language from the investment plan and facilitate a dialogue between Electrify America, SDG&E, the California Public Utilities Commission, and other stakeholders to expedite the process to address concerns over fair and reasonable EV rates for the SDG&E service territory. SANDAG would be pleased to assist in this dialogue as appropriate.

SANDAG also urges CARB to consider requiring redundant Level 2 charging wherever fast charging is installed to support both plug-in hybrid EVs and battery EVs. The San Diego region’s passenger vehicle market currently is composed of about 60 percent battery EVs and 40 percent plug-in hybrid EVs, and the California Energy Commission forecasts that the regional market will remain a mix, with the percentage of plug-in hybrid EVs increasing over time.

### **Highways and Regional Routes**

SANDAG supports the inclusion of the Interstate 15 Riverside to San Diego corridor in the Cycle 2 Investment Plan and recommends again that fast-charging projects also include some number of Level 2 charging. This would enable plug-in hybrid EVs and battery EVs not equipped with the fast-charging connector to recharge enough to continue their drive on electric power rather than potentially switching over to gas.

### **Shared and Autonomous Vehicle Charging**

SANDAG also supports the inclusion of infrastructure investments that focus on shared and autonomous vehicle electrification and recommends that San Diego County be designated as a site for Electrify America to build a commercial autonomous EV fueling station. In 2017, SANDAG, in partnership with Caltrans District 11 and the City of Chula Vista, was designated as one of two Automated Vehicle Proving Grounds in California by the U.S. Department of Transportation and subsequently established the San Diego Regional Proving Ground (RPG). To support the RPG, SANDAG has developed an extensive network of public, private, and nonprofit partners, including autonomous vehicle companies. The regional attributes and commitment to autonomous transportation, as well as our established consortium, make San Diego the ideal location for the commercial autonomous EV fueling stations as well as a future Green City initiative.

SANDAG also has developed a Regional Mobility Hub Strategy to demonstrate how transportation services, amenities, and supporting technologies can work together to make it easier for communities to access shared mobility choices and minimize single-occupancy vehicle trips. In light of California Senate Bill 1014 (Skinner), the ride-hailing industry will need to transition to zero-emission vehicles over time, and SANDAG is working to support that transition through the mobility hub strategy. Investment from Electrify America to support shared vehicle electrification in the San Diego region will help to amplify these efforts.

## **Disadvantaged Communities**

SANDAG encourages CARB to recognize the unique nature of transportation-related projects when considering Electrify America's proposed investments in disadvantaged and low-income communities. When selecting charger locations, projects that help connect disadvantaged/low-income communities and/or low-income households to key destinations like education and employment centers also are needed. Rather than limiting these projects to specific census tracts, travel data could be used to identify projects that directly benefit disadvantaged and low-income communities based on actual commuting patterns. Supporting the transition to zero-emission vehicles will provide important air quality benefits to communities regardless of charger locations.

## **Bus and Shuttle Charging**

SANDAG supports the inclusion of funding for dedicated infrastructure at depots, layover points, and on key routes for buses and shuttles in collaboration with transit providers. SANDAG works closely with the region's two transit operators (North County Transit District and Metropolitan Transit System) and Caltrans to help advance transportation-electrification efforts in the region. Whether through the implementation of mobility hubs, placement of EV charging stations along the state highway system, or development of zero-emission bus pilot programs, SANDAG continues to explore how electrification investments may be maximized to address the region's mobility and sustainability goals.

## **Marketing, Education, and Outreach**

SANDAG recommends that Electrify America include additional funding to provide education and outreach to permitting officials of Authorities Having Jurisdiction (AHJs). Electrify America previously expressed concern over difficult permitting processes in California and the need for increased awareness and understanding by permit officials and AHJ staff. The Governor's Office of Business and Economic Development is scheduled to release a Plug-in Charging Station Development Guidebook this year. In 2016, SANDAG and the Center for Sustainable Energy developed [permit streamlining materials](#) (pursuant to California Assembly Bill 1236 [Chiu, 2015]) for site developers and local governments as part of [Plug-in San Diego](#). These and other materials could be used for continuing education on permitting statewide.

Thank you in advance for your consideration of these comments. If you have any questions or comments, please contact Robyn Wapner at (619) 699-1994 or [robyn.wapner@sandag.org](mailto:robyn.wapner@sandag.org).

Sincerely,



KIM KAWADA  
Chief Deputy Executive Director

KKK/RWAP/kwa