LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

A Tides Center Project

Sent Via Email October 26, 2018

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

Re: Electrify America Cycle 2 Investment Plan

Electrify America's Cycle 2 Investment Plan offers an opportunity to offset emissions and increase ZEV usage in disadvantaged communities statewide. Leadership Counsel for Justice and Accountability works with grassroots community partners in rural and low-income communities in the San Joaquin and Eastern Coachella Valleys. We have submitted various comment letters pertaining to the development and approval of Electrify America's Cycle 1 investment plan. Although Electrify America's Cycle 2 investment plan makes progress in incorporating select previous recommendations to expand ZEV access and adoption throughout California's disadvantaged communities, we offer these comments to further this goal and to ensure investments provide maximum benefits to low-income and rural communities in the San Joaquin Valley and Eastern Coachella Valley. Until these recommendations are incorporated, we urge CARB to not approve of the proposed Cycle 2 Investment Plan.

Green City Initiative

Although we acknowledge the innovative approaches in Electrify America's investment in Sacramento, we recommend EA select a rural community and/or small town as potential sites for Green City initiatives for Cycle 2. We recommend the following communities in the San Joaquin and Eastern Coachella Valley be identified for Cycle 2 Green City Investments: Delhi, Matheny Tract, Lanare, Cantua Creek, Cutler-Orosi, Ivanhoe, Madera, and Mecca, Thermal, North Shore and Oasis. There are increasing opportunities in other places as local and regional jurisdictions begin to study alternative transportation solutions that both address pollution and affordability. For example, the Kern Council of Governments is currently developing a Rural Transit Alternative plan which seeks to introduce several transit service strategies beyond a fixed route and demand/responsive service and investigate where in rural Kern County electric vehicles with supporting infrastructure may be appropriate. Identification of these communities presents an opportunity for Electrify America to address regions that are critically underserved by vehicle charging infrastructure. We believe that the selection of a Rural "Green City"

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component provides EA with valuable data and meets the goal of increasing ZEV ridership and vehicle adoption.

Establish 50% of Investments to Disadvantaged Communities Throughout All Proposed Funding Categories

In order to fulfill CARB's mandate for investment in DACs, we recommend that EA dedicate at least 50% of funding throughout every proposed investment category to disadvantaged communities. The minimum set-aside of 35% set forth by CARB does not accurately capture the historical disinvestment in low-income communities who face multiple barriers to clean energy infrastructure and renewable energy. Furthermore, we encourage CARB and Electrify America to include rural census tracts as part of the overall investment strategy. Finally, to ensure equity in EA's Cycle 2 investments we insist that this allocation of 50% be applied throughout each investment program.

Improve Home Charging Alternative Financing Program

We believe that increasing access to home charging addresses range anxiety in relation to gaps in highway charging infrastructure. However, proposed programs such as the zero money down charging financing plan still require full repayment from low-income residents. This requirement serves as a barrier for many low-income residents who have limited resources and further prevents ZEV adoption in low-income communities. We recommend that EA consider grant programs for residents with a proven median household income (MHI) of 80% the state average. This will allow Electrify America's alternative funding scenarios to align and complement established practices such as grants and rebate programs for new or used ZEV purchases.

Another area of concern is the conditions of limitation included in the "No-Money Down Residential Offer." A footnote citation states that the "offer is limited to EV drivers with a circuit panel and associated electric meter dedicated to their residence (not shared), as well as a dedicated parking spot." However, we recommend this program should also consider aging infrastructure and housing stock conditions and provide the flexibility for inclusion of low-income residents with at-home wiring infrastructure that cannot adequately support vehicle charging infrastructure. Otherwise, rural communities with poor housing stock will be categorically exempted from program eligibility.

Finally, we recommend that the "one-stop shop" website initiative should be readily available in multiple languages to address barriers relating to linguistic isolation. This website should also be available on a mobile-platform or cell phone application.

Expand Funding Allocation and Scope of Rural Charging Investments

Leadership Counsel and several other organizations requested that the Cycle 1 Investment Plan include a robust Rural Charging component. However, those comments were not incorporated into the first Cycle. Although we approve of Electrify America's Rural Charging Pilot"…this pilot program will allow Electrify America to gain insights that may be leveraged to sustainably deploy additional L2 charging in rural communities across future cycles of investment."

In order to secure greater access of chargers to DAC's as well as furthering the goal of establishing a state-wide charging station network, we believe the Cycle 2 Investment Plan should increase direct funding allocations to rural communities. Even as currently cited in the EA Appendix, by 2021 rural stations will make up a fractional 35-50 of the anticipated 2,630-3,460 total projects. [1] We offer the following recommendations to existing policies to increase investment in rural charging infrastructure.

- ❑ **Increase Allocation for Rural Charging Program:** Currently, the draft investment provides minimal investment for rural communities and instead focuses a higher percentage of funding to metro regions and new autonomous vehicle charging technology- "specifically driverless/autonomous vehicles". While we support new and innovative clean technology, we recommend that EA increase allocations in the Rural Charging program to a total of four million ($4 million) and reducing allocation for autonomous vehicles to one million ($1 million). Doing so will ensure that investment is prioritized in existing, underfunded communities who have the potential to drastically transition California away from petroleum reliance and into a 100% zero emission and renewable energy economy. Many rural communities emerged as a result of segregated land-use practices and intentional disinvestment in low-income communities of color and as a result, continue to front the impacts of adverse air quality impacts.
- ❑ **Alternative Charging Stations:** The allocation and prioritization of rapid and reliable charging stations can support increased rural ZEV adoption in rural communities and minimize range anxiety for communities with long commute travel time. In addition to Level 2 chargers and mobile solar charging stations, Electrify America must facilitate the development of charging infrastructure with direct current fast chargers (DCFC) in rural communities to maximize mile per hour charge for residents living in isolated areas with limited ZEV technology accessibility. Superchargers are among the fastest electric vehicle charging networks with 30-minute recharge capability. These chargers fit rural charging needs due to their ability to adjust to key travel patterns and preferred charging locations. Currently, existing supercharger networks like Tesla only offer limited

[1] Electrify America *California ZEV Investment Plan: Cycle 2*, pages 62-63.

investments throughout the San Joaquin and Eastern Coachella Valley.[2] We recommend Electrify America identify supercharging stations as an alternative to traditional chargers in rural, disadvantaged communities who only offer a two mile per hour charge. In addition to minimizing range anxiety in rural communities, superchargers will help expedite ZEV adoption in rural and disadvantaged communities.

- ❑ **Include Rural Highways:** We encourage EA to identify highway charging stations along highways with East-West traffic to meet the mobility needs of the San Joaquin Valley. For Example, the Cycle 1 investments targeted major metropolitan areas and Interstate 5 and State Route 99.
- ❑ **Support Alternative Transit Models in Rural Communities:** We also encourage EA to coordinate with local transit agencies and CBOs to support rural microtransit and rideshare projects. Coordination will support microtransit pilot programs such as FRTA's involvement with launching Chevy Volts and Cantua Creek's *Van Y Vienen.* Tulare County is also launching new carpool programs with Self Held Enterprises and CalVans. Fresno County and Tulare County have established microtransit cultures demonstrated by their respective rank as number 1 and 2 for most ridership through CalVans. Coordination with rural microtransit projects can also identify ideal charging stations for rural travel corridors.
- ❑ **Expand Eligible Locations for Rural Charging:** Electrify America has noted an intent to focus on medical centers and educational facilities for its charging infrastructure. We recommend that EA expand its consideration to additional community focal points including grocery markets, banks, libraries, and volunteer fire stations. Many communities lack the aforementioned community focal points so open consideration of alternative sites will be paramount to driving ZEV adoption in rural communities on a case-by-case manner.
- ❑ **Increase Information for Rural Investment:** Electrify America states "this pilot program will allow Electrify America to gain insights that may be leveraged to sustainably deploy additional L2 charging in rural communities across future cycles of investment."[3][3] While we agree that Cycle 2 should inform future investments, we recommend that Electrify America direct funding to produce a study on potential rural ZEV solutions to leverage in Cycle 3 and Cycle 4 Rural allocations.
- ❑ **Establish a Rural Advisory Committee**: For rural pilot programs to meet full potential, we encourage the formation of and collaboration with rural advisory boards to support

[2]https://www.tesla.com/findus?v=2&bounds=35.73373830965449%2C-117.05957517616633%2C34.18288332933498%2C-121.01465330116633&zoom=9&filters=store%2Cservice%2Cdestination%20charger%2Csupercharger

[3] Electrify America *California ZEV Investment Plan: Cycle 2*, page 58.

project development and implementation. Working with organizations with established track records of community engagement also will yield projects with community buy-in as well as increase education concerning ZEV infrastructure. Successful projects yield implications for EA's investment for California and other states mandated by the Consent Decree.

Regional Routes and Highway Investments

The current plan states "In Cycle 1, Electrify America prioritized the build-out of a cross-country network of charging infrastructure focused on highly traveled corridors between major metropolitan areas. In Cycle 2, Electrify America will further enhance the highway corridors outlined in the Cycle 1 California ZEV Investment Plan, while also developing new corridors to support the regional travel needs of drivers in top BEV markets." While we acknowledge projections for increased ridership in metro areas, we recommend that Electrify America provide charging infrastructure installation for corridors beyond I-5 and SR 99 within the San Joaquin Valley as noted in previous comment letters included recommendations for alternative routes including, but not limited to Highway 43, 41, 145 and State Route 198. These are two-lane conventional highways that serve smaller cities and unincorporated communities. Using local traffic modeling data and sensitive census tracts via CalEnviroScreen 3.0 should be adopted in overall project selection.

Currently, the highway investments proposed by Electrify America include the Fresno-Modesto corridor along the 99 and Fresno-Sierra Mountain Corridor. As stated in previous comment letters we encourage Electrify America to develop new corridors to support regional travel needs such as East-West travel along SR 198 and SR 168 for example. Such is the need for East-West transit that Tulare County Association of Governments and Fresno Council of Governments to coordinate the Cross-Valley Corridor Project, a passenger rail that connects cities along the eastern foot region of Tulare County as far west as the town of Huron in Fresno County. Additional routes include North-South highways between the I-5 and SR 99 such as SR 43 and SR 41.

In the Eastern Coachella Valley--which includes the City of Coachella, and the unincorporated communities of Thermal, Oasis, Mecca, and North Shore--we recommend following the same process outlined above. This should include Highway 111 and 86 and Interstate 10.

Bus and Shuttle Charging Initiative

As an extension of the previous recommendation, we encourage EA to dedicate at least 50% of funds for its Bus and Shuttles Initiative for disadvantaged communities. Prior to the adoption of Electrify America's Cycle 2 Investment Plan, we recommend that rural microtransit

programs and other rural transit models be considered for funding allocations for Bus and Shuttle Charging Infrastructure. This policy shift acknowledges the historical difficulty that large, fixed route transit services have faced in meeting the transit needs of rural disadvantaged communities. These program investments leverage ongoing development of rural microtransit pilot programs in Cantua Creek, Huron, Delhi, Cutler, Orosi, and Visalia.

We also encourage EA to coordinate with Rural Transit Agencies such as transit agencies that serve rural communities and school buses. Charging station infrastructure will support state grants for Bus replacement thus supporting existing programs that increase overall usage. We also encourage EA to coordinate with Rural Transit Agencies that serve rural communities and who are actively engaging with state agencies to remove older bus inventory that does meet federal motor vehicle safety standards. For example, the San Joaquin Valley contains many school buses manufactured prior to 1977. These vehicles were not subject to oxides or nitrogen and PM emission control and can cause adverse health impacts to children utilizing these buses.[4]The placement of additional charging infrastructure in rural communities will make the jurisdictions available for bus replacement, thus support existing programs that increase overall usage.

Contract with CBO's to Develop Educational Materials and Increase Effectiveness of Educational Campaign

We thank Electrify America for actively engaging with LCJA and other local CBO's to provide input about rural investments in the San Joaquin and Eastern Coachella Valley. To continue ongoing collaboration and ZEV education and investment in rural and disadvantaged communities, we recommend that Electrify America contract with local community organizations with established relationships to support with the Ride and Drive Events and other outreach events including the development of community education materials.

Prioritize Solar and Renewable Energy for EA's Energy Portfolio

Although we appreciate that EA will consider renewable energy we recommend that EA include policy language to prioritize renewable energy at every charging installation if possible.

Transparency in Methodology and selection Process and production of a Map of Cycle 1 and Cycle 2 Investments

[4] *See* Air Resource Board, 2008. Lower-emission School Bus Program.

Available online at https://www.arb.ca.gov/bonds/schoolbus/guidelines/2008lesbp_rev_12_20_11.pdf

When determining the location of infrastructure investment for selection of sites and charging stations for multi-unit dwellings (MuDs), we recommend that clear and transparent methodology and selection process is made public and shared with key stakeholders to inform them on the identification of specific communities selected for investment. Furthermore, we recommend that a map of the census tracts in included in the final report in order to demonstrate the investment in disadvantaged communities throughout the state. Without revealing any proprietary information, a census- tract level map of targeted investment areas, overlaid with the CalEnviroScreen 3.0 map could offer the public valuable evidence of Electrify America's commitment to disadvantaged communities. The current map available on Electrify America's current website suffers from lack of detail and transparency. We believe that this map will support EA's advertising as well as build public trust.

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Thank you for consideration of our comments. We look forward to further collaboration with Electrify America to further ZEV infrastructure development and adoption throughout low-income and disadvantaged communities throughout California. For further questions, please contact Pedro Hernandez at phernandez@leadershipcounsel.org and Abigail Ramirez at aramirez@leadershipcounsel.org.

Sincerely,

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