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Mr. Klein,

Coalition Helping America Rebuild and Go Electric ([CHARGE](#)) is made up of transportation, industry, environmental, labor, health, equity, and civic organizations that support smart policy to electrify America's transportation system. We want to share our thoughts on implementing the National Electric Vehicle Infrastructure (NEVI) program, having recently learned more about the challenges and opportunities from the perspective that state departments of transportation have shared.

State departments of transportation (DOTs) are the primary recipients of the \$5 billion program to develop a network of electric vehicle (EV) chargers along major corridors on the National Highway System to provide certainty to the traveling public that they won't be stranded in their EV due to a lack of charging access. Understanding these concerns informed our broader thinking on the specific role NEVI could play in the nation's overall network of EV charging infrastructure.

After several members of the CHARGE coalition recently met State DOTs across the country, there is a consensus that they want to ensure chargers are located well in terms of service area and safety, well-maintained, and operated efficiently. However, states and their partners need to gain experience with the types of contracts this program will require. Further, states could use clear guidance on what should be procured (including specifications) and what other services and operational needs should be included in contracts.

It is important that chargers be installed in smart locations that serve travelers and local businesses well. Unfortunately, installing chargers at a truckstop or on other state-owned land out by the highway could be the easy, if less than ideal, default because of the requirement that chargers be within one mile of an Interstate, and because finding local partners to collaborate on more complex locations is more difficult. If the nation defaults to investing NEVI funds in chargers far-removed from communities, we will miss opportunities to support businesses on main streets just off the highway, to provide more attractive places for travelers to charge, and to support charging opportunities for residents in those communities.

Geographic location isn't the only challenge. The physical infrastructure around the charger matters a great deal. The area needs to be plowed and de-iced; the pavement maintained, and trash removed. Also, host site operations must provide adequate lighting and a reasonable level of security. This will matter to everyone but will be even more important to women traveling alone and people of color, who for good reason, might not be comfortable sitting in their car or

standing on the side of a highway at night for the time it takes to charge their car. Given that charging vehicles will take longer than refilling a gas tank, having a business to go to, like a coffee shop, a retail establishment, or other places to run errands, particularly businesses that are open late, is likely going to be more attractive to consumers. Safe walking infrastructure will be essential for travelers to access these services while their vehicle is charging. Safe biking infrastructure, along with access to and charging for electric bikes and scooters could enhance access to additional services for travelers. At the same time, we want to ensure that medium-and heavy-duty vehicles can also use this infrastructure whenever possible, which means it is important for site design to include pull-throughs and for any canopies to provide clearance for larger vehicles.

There are also some regulatory issues state DOTs will need to deal with depending on the state. For example, some states have offices of weights and measures in their Agriculture Departments that have some authority over electricity, which could add a layer of bureaucracy.

In light of the issues outlined above, here are some strategies the administration should pursue:

- 1) The Joint Office on Energy and Transportation (JOET) should provide additional guidance for the location of chargers and site design. Smart, viable convenient locations near local businesses and services will build a user base and attract private investment and management much more quickly.
- 2) The administration should develop and distribute an easy-to-read primer on meeting federal reporting requirements and make a model contract available to set up effective, accountable relationships between transportation agencies, utilities and EV charger companies (covering specifications, installation, operations, and maintenance). In support of Justice40 goals, this primer should include metrics to ensure equitable distribution of charging ports and fair energy pricing.
- 3) As we think beyond the NEVI program and its prescribed corridors to the whole future charging ecosystem, JOET should provide recommendations to coordinate with other sectors to ensure there are no gaps in the EV charging infrastructure, including residential (particularly in high density areas where many people live in multi-family dwellings, and where renters who lack the authority to install chargers at home), commercial, public parks and facilities, etc, including a set of recommendations from the Joint Office regarding building and zoning codes for widespread EVSE deployment.

We're at the very beginning of electrifying our transportation system and we need to think big and far ahead. What will happen ten years from now when millions of Americans travel for Labor Day weekend? While NEVI won't be enough in itself to solve that challenge, it will play a critically important catalytic role and will be a necessary complement to other state, local, and federal programs. As such, there is a need to ensure that the program design is set up in a way that enables equitable deployment of charging stations that are used and useful.

Thank you for your consideration,

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